

Appendix D

Remedial Action Cost Estimate

OU 1-10 Group 3, Remedial Action Cost Estimate

Project/Construction Management	\$250,000
Soil Excavation/Removal	250,000
Site Preparations (Line isolations, etc.)	75,000
PM-2A Tank Removal Subcontract	1,300,000
Soil Back Fill and Restoration	125,000
PM-2A Tank Remedial Action Grand Total	\$2,000,000

Justification

Project/Construction Management	June 9 actuals-240,363 K
Soil Excavation/Removal	June 9 actuals-241,390 K
Site Preparations (Line isolations, etc.)	75,000 Team Estimate in May
PM-2A Tank Removal Subcontract	From Proposal – Al Yonk Utilized the costs for Mobilization and completion of the load testing from attachment 4 of the original Portage proposal
Soil Back Fill and Restoration	Backfill 4,000 cy at \$27/Y = 108,000 plus extras. Did not include TSF-26 Surface Soils
PM-2A Tank Remedial Action Grand Total	\$0

Appendix E

Safety Category Evaluation

414.02
04/18/2001
Rev. 04

SAFETY CATEGORY DESIGNATION AND RECORD

Safety Category Evaluation Performed By: Miyasaki, Dean/Wendt, Kraig

Date: June 18, 2003

Facility/Structure/System/Component: PM-2A Tank Remediation

Hazard Category: 3

IDENTIFICATION OF ITEM	SAFETY CATEGORY DESIGNATION	TECHNICAL JUSTIFICATION
All equipment and components purchased and/or fabricated for performing the TSF-26 PM-2A remedial actions.	Preliminary determination of Consumer Grade (CG)	TAN SAR INEL-94/0163 and EDF-3250 addresses the hazardous inventory for the PM-2A remedial operations at TAN. No "safety significant" structures, systems, and components are anticipated for the PM-2A tanks and associated piping. Therefore the equipment and components for the remedial actions of the PM-2A tanks is consumer grade.

Note: Identify and record safety category in accordance with MCP-540, and obtain appropriate approvals. Completed and approved form becomes a part of the safety basis documentation.

<u>A. G. Ramos</u> Safety Analysis Lead/Supervisor Concurrence Printed/Typed Name	<u>per attached e-mail</u> <u>K.M. Wendt for A. Ramos</u> Safety Analysis Lead/Supervisor Concurrence Signature	<u>6-18-03</u> Date
<u>L. T. Evens/J. E. Bruce</u> Facility/Program/Project Approval Printed/Typed Name	<u>K.M. Wendt for L. Evens per attached e-mail</u> Facility/Program/Project Approval Signature	<u>6-18-03</u> Date

Appendix F

Agency Comment Resolution Forms

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Group 3 Remedial Design/Remedial Action Work Plan Addendum 1 for TSF-26, PM-2A Tanks – Phase 1 Tank Removal and Site Remediation for Test Area North, Waste Area Group 1, Operable Unit 1-10, DOE/NE-ID-11161, Revision 0, June 2004.*

DATE: 06-04-04

REVIEWER: DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1	6.2		Several times throughout the document, critical data is required from sampling activities that occurred in the summer of 2003. This data should be available by now and an appropriate reference to the Limitations and Validation (L&V) Report, or another report from the sampling and analysis activities, should be referenced and included as part of this Remedial Design/Remedial Action (RD/RA) Work Plan.	Comment Incorporated. Reference to data summary of sampling activities has been included in Section 4.3.1 and the last paragraph of Section 1.2. This data summary was transmitted to the Agencies on August 27, 2003 under DOE-ID Letter EM-ER-03-213.
2			Throughout the document there is the assumption that Institutional Controls (ICs) will continue at the site. Please provide the information that has led to this conclusion. If it is possible, all contamination can be removed, such that subsequent sampling and analysis indicates no soils are above what would be considered “clean” (2.3 pCi/g for Cs-137), and there are no other circumstances that would require ICs. A discussion of free release of the site should be included in the RD/RA Work Plan.	<p>Comment Noted. Based on the ROD remedy only soil that exceeds the FRG of 23.3 pCi/g requires excavation [see item 2 in Table 2-2, Section 2.2 on page 2-3]. The Group 1 surface soil at both the TSF-06 site and the TSF-26 site has been remediated to this requirement and confirmation sampling is nearly completed. By using this approach specified in the ROD, there is no requirement to continue excavation to a free release level of 2.3 pCi/g. Consequently the RD/RAWP has been written acknowledging that institutional controls will be required for 100 years, which is the timeframe for Cs-137 to decay from the FRG of 23.3 pCi/g to the free release level of 2.3 pCi/g.</p> <p>The following sentence has been added prior to the last sentence of the paragraph of Section 4.3.9, “Should confirmation sampling prove that concentrations of Cs-137 are less than 2.3 pCi/g, the site will be released for unrestricted use without the implementation of institutional controls.”</p>
SPECIFIC COMMENTS				
1	Abstract		Phase 1 is mentioned in the abstract, however, it is not clear what activities constitute Phase 1 work, and Phase 2 is not mentioned. It is recommended that a brief explanation of each one, along with the relationship between the phases and the addenda, be included.	Comment Incorporated. Abstract changed to read, “... to addenda to the original work plan. This addendum, Addendum 1, addresses Phase 1 remedial actions, which include tank removal and site restoration. Addendum 2 will address Phase 2 remedial actions, which include tank contents’ treatment and disposal...”

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
2	1 4 th Parg.	1-2	Please include in this paragraph a brief description of the removal and disposition of the piping from the PM-2A Tanks.	Comment Incorporated. The following sentence has been added to the end of the paragraph, “In accordance with the requirements specified in the Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA) closure plan (DOE-ID 2004c) feed piping to the PM-2A tanks will be removed and disposed.”
3	1.1.1 & 2	1-3	In this section, references to the “ROD amendment (DOE-ID 2004a)” should more accurately state “ROD amendment and Explanation of Significant Differences (ESD) for the PM-2A tanks (DOE-ID 2004a).” Information relevant to the PM-2a tanks was contained in the ESD. The ROD amendment pertained only to the V-tanks.	Comment Incorporated. Updated globally. Changes made to Sections 1.1.1, 2, 7.1, and 7.2.
4	1.2 Figure 1-2	1-8	Please add a North arrow to the figure.	Comment Incorporated. North arrow added to Figure 1-2.
5	1.3 5 th Bullet	1-11	It is recommended to reword this bullet to state: “Soil confirmation sampling will be performed to determine the Cs-137 concentration remaining at the site post-remediation for the potential application of ICs.” See General Comment Number 2.	Comment Noted. See resolution to DEQ General Comment No. 2 above.
6	1.3 Last Bullet	1-11	Recommend replacing “will” with “may.” See General Comment 2.	Comment Incorporated.
7	2.1 2 nd Parg. 2 nd Sentence	2-1	Please include “compliant CERCLA storage” to the tank and waste inventory removal. This RD/RA WP describes waste inventory removal (tank contents) only to the point of storage in an approved CERCLA facility (TAN-607 High Bay).	Comment Incorporated. Paragraph changed to read, “... This RD/RAWP addendum addresses tank and waste inventory removal, placement of the tanks with waste inventory in the tanks in compliant CERCLA storage, contaminated soil removal...”
8	Table 2-1	2-3	The table would greatly benefit from a revision that aligns the three columns of text with adjacent, related ROD Remedy/Element/Criteria listings. The columns are skewed, especially on Page 2-5. Additionally, horizontal lines across the page, separating the numbered first column criteria from the next entry, would provide clarity to the table’s review.	Comment Incorporated. The table has been revised to align the information in each column and add a divider line between each numbered ROD element.

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
9	Table 2-1 Performance Criteria 3 rd Bullet	2-3	See General Comment 2.	Comment Noted. See resolution to DEQ General Comment No. 2 above.
10	2.4.1 11 th Bullet	2-9	See General Comment 2.	Comment Noted. See resolution to DEQ General Comment No. 2 above.
11	2.4.2 8 th Bullet	2-10	This is the first mention in the document of grout that may be added to the tanks for sludge treatment. It is recommended that a brief explanation of this proposed treatment be included, and include a reference to the Addendum 2 RD/RA Work Plan for the PM-2A tanks, since this is where treatment will be described.	Comment Incorporated. The following note has been added to the text following bullet no. 8, “Note: INEEL TFR required the design of the tank cradles and associated design components (e.g., TAN-607A High Bay floor loading, transport configuration) be designed to accommodate the potential addition of grout during Phase 2 treatment. Specific treatment technologies will be addressed during Phase 2 remedial actions and will be documented in Addendum 2 to the Group 3 RD/RAWP.”
12	2.4.2 11 th Bullet	2-10	See previous comment. It is assumed “Phase 2” refers to Addendum 2.	Comment Incorporated. The following note has been added to the text following bullet no. 11, “Note: INEEL TFR required the design of the tank cradles and associated design components (e.g., TAN-607A High Bay floor loading, transport configuration) be designed to accommodate the potential addition of grout during Phase 2 treatment. Specific treatment technologies will be addressed during Phase 2 remedial actions and will be documented in Addendum 2 to the Group 3 RD/RAWP.”
13	Table 3-1 Mitigation Action 3 rd Parg.	3-1	Considering that the concrete cradles and sand pads are already exposed, and evaluation and sampling are planned, please explain the relevancy of samples collected in 2003.	Comment Incorporated. Reference to 2003 analytical data is incorrect. Mitigation Action changed to read, “Data (e.g., visible soil staining, visual inspection of the tank exterior, soil radiological readings) will be used to provide information during remedial actions to determine whether additional remedial actions for the sand pads and associated concrete cradles are required. Contingent planning...”

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14	4.2 Bullets	4-2	Consider adding an additional item that states that the cumulative effect of the surface spills did not result in migration down to the tank bedding sand/concrete cradles, as well.	Comment Incorporated. Additional bullet added to design assumptions that reads, “The cumulate effect of surface spills associated with the PM-2A evaporator did not result in contamination of the tank sand pads or concrete cradles.”
15	4.3.1 1 st Parg. 2 nd Sentence	4-2	Please include a reference for the “...sampling conducted in 2003...” Where can the data be found?	Comment Incorporated. Reference to data summary of sampling activities has been included. {See DEQ General Comment No. 1 above}
16	4.3.1 1 st Parg. 3 rd Sentence	4-2	Please indicate whether sampling of the liquids from the piping will be required and the planned disposal for them. It may be useful to investigate whether the liquids can be added to the tank contents.	<p>Comment Incorporated. Paragraph changed to read, “... will be drained (if liquids are present), cut, capped, and removed from the site. Any waste generated will be managed in accordance with the Waste Management Plan (INEEL 2004a); treatment of wastes removed from the feed piping will be addressed in Addendum 2 to the Group 3 RD/RAWP. Following removal of the waste from the piping, the piping will be managed...”</p> <p>Revised the 9th bullet in Section 6.2.2.1 and the 3rd bullet in Section 6.2.2.6 and add a note after each of these bullets as follows:</p> <ul style="list-style-type: none"> • “Remove and containerize waste, if present, from process feed piping. Sample and manage waste in accordance with the Waste Management Plan.” <p><i>“Note: Treatment of waste removed from the feed piping, if required, will be addressed in Addendum 2 of the Group 3 RD/RAWP.”</i></p>

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17	4.3.2 2 nd Parg. Last Sentence	4-3	State how the removed sand from the sand pad will be monitored.	<p>Comment Incorporated. Last sentence of paragraph changed to read, “During sand pad removal activities, data will be collected to determine whether there is evidence of a release from the tank. Data points may include visual inspection of the sand for staining, radiological surveys of the sand following removal (i.e., surveys of the surface of waste boxes), and other radiological samples, as determined practical.”</p> <p>Third note in Section 6.2.2.2 changed to read, “Special Note: During sand removal visually monitor sand for staining or discoloration. Following sand removal perform radiological monitoring of the sand and collect other radiological samples, as determined practical. (This action...”</p>
18	4.3.2 4 th Parg.	4-3	It is not clear why a 6-inch lift of soil will be spread over the surface of the entire TSF-26 site (except for, of course, the PM-2A tank excavation) to minimize the spread of contamination (all Cs-137, it is assumed). Please discuss how this 6-inch layer of clean fill will impact the on-going confirmation sampling and cleanup. Also, has the use of the fixative been considered in lieu of the 6-inch lift of soil? The purpose is to minimize wind-blown contamination, which the fixative is capable of doing.	<p>Comment Noted. Clean fill will be placed following collection of confirmation samples under the Group 1 RD/RAWP. Clean fill was chosen as opposed to the application of a fixative based on the “traffic” anticipated during mobilization, lift and transport, and demobilization from the site. The application of clean fill also allows for proper construction of the crane pad and associated transfer paths.</p> <p>First paragraph of Section 6.2.2.12 changed to read, “After completion of confirmation sampling, associated remedial action tasks, and Part 1 of the pre-final inspection...”</p>
19	4.3.2 Last Parg. 3 rd Sentence	4-4	Please indicate whether sampling of the waste from the piping will be required and the planned disposal for them. It may be useful to investigate whether the waste can be added to the tank contents.	Comment Incorporated. Paragraph changed to read, “... will be drained (if liquids are present), cut, capped, and removed from the site. Any waste generated will be managed in accordance with the Waste Management Plan (INEEL 2004a); treatment of wastes removed from the feed piping will be addressed in Addendum 2 to the Group 3 RD/RAWP. Following removal of the waste from the piping, the piping will be managed...”

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20	4.3.3	4-4	In prior meetings, it was discussed that a sealant may be used on the floor of TAN 607A High Bay. This option should be included in the document, if it is still under consideration.	Comment Noted. EDF-PEI-1004 has been updated to reflect a 30-mil polypropylene liner as the primary secondary containment. No credit will be taken for any sealant that may be applied to the floor of the TAN-607A High Bay.
21	4.3.3 4 th Parg. 2 nd Sentence	4-4	Please change the shielding height to 9 feet above the floor level, as discussed during the WAG-1 Conference Call on 6/03/04.	Comment Incorporated. The perimeter and the height of the shield walls has been changed based on final shielding configuration and specified in revised EDF-PEI-1004.
22	4.3.4 2 nd Parg. 2 nd Sentence	4-5	The reference should be the “Mobile Crane Lift Plan, Appendix C.” The drawing (INEEL PM-2A Tank, Tank Lifting Details) indicates that the two spreader bars below the 22-foot bar are 16.5 feet in length.	Comment Incorporated. Reference changed to, “... spreader beams (Mobile Crane Lift Plan; Appendix C). Paragraph changed to read, “... Two 16-ft, 6-in. spreader bars...”
23	4.3.7	4-6	a) Text describing the allowable length of time these tank excavation areas will remain open, prior to being sampled, is recommended. Wind-blown sediments or possible side slope sloughing could mask true subsoil values for confirmation samples. Please bracket the timeframe. b) Please indicate when and how the need for the storm drainage line will be determined.	a) Comment Noted. See schedule presented in Figure 6-1. All activities will be completed in the FY04 field season. b) Comment Incorporated. Deleted reference to storm drainage line.
24	Figure 6-1	6-2	It would be useful if the delivery and review period for the pre-final inspection checklist were included in the schedule.	Comment Noted. See Table 6-1 for more detailed identification of anticipated delivery and review periods.
25	6.2.1.6 2 nd Parg.	6-6	The application of a fixative should be included as an option to prevent the generation of fugitive dust.	Comment Incorporated. Second paragraph changed to read, “Precautions such as water spray, application of fixatives, wind monitoring...”
26	6.2.1.14	6-7	Please include a justification for the statement that ICs will continue to be required at the PM-2A tank site after site remediation is complete.	Comment Noted. See resolution to DEQ General Comment No. 2 above.
27	6.2.2.2 9 th Bullet	6-9	See Specific Comment 18	See resolution to DEQ Specific Comment No. 18.
28	6.2.2.6	6-11	Identify if the waste will be sampled and the potential	See resolution to DEQ Specific Comment No. 16 and 19.

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
	3 rd Bullet		disposition path(s).	
29	6.5.4	6-18	Please include a justification for the statement that current ICs are not expected to change after remediation of the PM-2A tanks.	Comment Noted. See resolution to DEQ General Comment No. 2 above.
30	8	8-1	Please indicate that recent discussions between the agencies may result in a change to the date for the Five-Year Review.	<p>Comment Incorporated.</p> <p>Based on discussion, the Agencies have agreed that the submittal date for the Five-Year Review report can be changed from February 28, 2005 to June 30, 2005. Besides aligning the review with the site-wide review schedule, the change to June will also be when remediation of more OU 1-10 sites has been completed and when RA reports have been drafted. Section 8 has been revised as follows:</p> <p>“Requirements for five year reviews are provided in Section 8 of the original Group 3 RD/RAWP. However, based on Agency agreement, the submittal date for the draft five-year review report is changed from February 28, 2005 to June 30, 2005. This submittal date change will allow the first five-year review for OU 1-10 to be performed as part of the INEEL site-wide review and be documented in the INEEL site-wide five-year review report. The five-year review for OU 1-10 will be performed in accordance with the INEEL Sitewide Five-Year Review Plan for CERCLA Response Actions (DOE-ID 2004f).” [DOE/NE-ID-11125, Revision 0, April 2004]</p>
31	Appendix A	Table A-1	a) IDAPA 58.01.05.008 [40 CFR §264.193(e)(1)(i)] states that external liners must be designed or operated to contain 100 percent of the capacity of the largest tank within its boundary. Currently, the secondary containment will not be able to contain 100% of the largest tank volume, but is designed to contain 200% of the current volume in the tanks. The tanks will not be receiving any more waste, but treatment will be occurring in the tanks. The potential additional volume must be considered in the calculation of secondary containment capacity.	a) Comment Noted/Incorporated. Statement added to PEI-EDF-1004 indicating that the capacity and compatibility of the liner system will be reevaluated prior to commencement of Phase 2 remedial actions. Implementation Strategy changed to read, “Secondary containment, consisting of a polypropylene liner supported by concrete shield walls,... The requirements to contain 100 percent of the capacity of the largest tank within its boundary will not be met,... adequate secondary containment capacity for all waste to be stored in the

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			<p>b) IDAPA 58.01.05.008 [40 CFR §264.195] requires tanks to be inspected daily. Table A-1 does not specify an adequate frequency for the tank inspections.</p> <p>c) IDAPA 58.01.05.008 [40 CFR §264.196(b)(1)] requires that the owner/operator remove within 24 hours, or at the earliest practicable time, as much of the waste from a tank that has leaked or spilled as necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed. There is no mention in Table A-1 of what actions will be taken if a tank leaks or spills other than removing the release from the secondary containment.</p> <p>d) IDAPA 58.01.05.008 [40 CFR §264.196(c)] requires an immediate visual inspection if there is a release to the environment. Based on this inspection, the owner/operator must prevent further migration of the leak or spill to soils or surface water and remove and properly dispose of any visible contamination of the soil or surface water. Table A-1 does not address actions that will be taken if a spill or release reaches the environment.</p> <p>e) In accordance with IDAPA 58.01.05.008 [40 CFR §264.196(d)], a release to the environment must be reported to the Regional Administrator within 24 hours and followed by a written report within 30 days, except if the leak or spill is less than or equal to a quantity of one (1) pound and is immediately contained and cleaned up.</p>	<p>CERCLA storage area. The capacity and compatibility of the liner system will be reevaluated prior to commencement of Phase 2 remedial actions...”</p> <p>b) Comment Noted. While these tanks have previously existed as part of a tank system, they are now more like containers than tanks. They have been disconnected from all inflow and outflow connections. There is minimal free liquid present. Therefore, weekly inspections are appropriate as opposed to daily inspections. The following sentence was added to the Implementation Strategy, “As the PM-2A tanks have been disconnected from all inflow and outflow connections and there is minimal free liquid present, weekly inspections of the CERCLA storage area will be conducted.”</p> <p>c) Comment Incorporated. Description of Regulatory Requirement augmented. Implementation Strategy changed to read, “... will be removed in accordance with this requirement. Response actions, including implementation of measures to prevent further release of hazardous waste (e.g., plugging) will be initiated within 24 hours, or at the earliest time practical.”</p> <p>d) Comment Incorporated. Description of Regulatory Requirement augmented. The following sentence has been added to the Implementation Strategy, “Upon detection of a release to the secondary containment system, an inspection will be conducted to determine if there has been a release to the environment. Appropriate response actions, including appropriate notifications, will be taken based on the results of this inspection.”</p> <p>e) Comment Incorporated. See resolution to DEQ Comment No. 30d above.</p> <p>f) Comment Noted. Specific requirements for management of staging piles are specified in the Waste Management Plan. Because of the relative immobility of the contamination (primarily Cs-137) present in the soils at TSF-26, the appropriateness of a liner has</p>

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			<p>f) According to IDAPA 58.01.05.008 [40 CFR §264.554(d)(ii)], a staging pile must be designed so as to prevent or minimize releases of hazardous wastes and hazardous constituents into the environment, and minimize or adequately control cross-media transfer, as necessary to protect human health and the environment (for example, through the use of liners, covers, run-off/run-on controls, as appropriate). A liner must be placed underneath the staging piles to prevent leaching of hazardous constituents.</p> <p>g) According to IDAPA 58.01.05.008 [40 CFR §264.554(h)] a staging pile may operate for up to two years after hazardous remediation waste is first placed in the pile. An extension of up to 180 days may be granted under IDAPA 58.01.05.008 [40 CFR §264.554(i)]. Table A-1 must specify that the staging piles will not operate for more than allowable time. Also, the staging pile must be closed within 180 days after the operating term expires in accordance with IDAPA 58.01.05.008 [40 CFR §264.554(j)]. Table A-1 must indicate that the staging piles will be closed in the appropriate timeframe.</p>	<p>been evaluated and a liner has been determined to not be necessary. The soils being stockpiled have been exposed to the environment for extended periods of time already and the use of stockpiles without liners is not expected to present any increased risk of release of the contaminants to the environment. As the WMP says, when these soils are removed, additional soils beneath the stockpile will also be removed to ensure that contamination in excess of the FRG does not remain behind.</p> <p>Ninth bullet in the WMP, Section 3.4.11.2 modified to read, “Upon completion of other remediation activities at the CERCLA sites, all remaining contaminated soils, including the staging piles and any soils that were contaminated as a result of the staging pile, must also be removed and disposed at an approved disposal facility in order to complete remediation activities. The area that was beneath the staging pile is subject to the same confirmation sampling as specified in the FSP to ensure that the contaminated soils have been effectively removed.”</p> <p>g) Comment Noted. Specific requirements for management of staging piles are specified in the Waste Management Plan. The last bullet of Waste Management Plan Section 3.4.11.2 states, “Staging piles must be completely removed by the end of the field season immediately following the field season in which the staging pile was created unless specific approval for an extension is obtained from the Agencies (typically limited to one additional year).”</p>
32	Appendix C EDF-1002 Sec. 3	3 of 26	Please clarify or offer text that describes the timing of the application of the dust suppressant on the exposed face/extent of the excavation. This is pertinent due to the timing of the CERCLA confirmation sampling event.	Comment Incorporated. EDF updated to provide flexibility in the application of dust suppression methods, including water spray, as deemed necessary. The fixative to be applied has been used at the INEEL previously and has been evaluated for disposal at ICDF.
33	Appendix C EDF-1004	4 of 10	Please add the text that addresses the installation of the tube planks in the assembly pit area, and how the epoxy will be	Comment Incorporated. Text addressing the installation of the steel tubing has been added to the text of the EDF. EDF-PEI-1004 has

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	Sec. 3.1 1 st Parg.		applied under the planks without damaging the integrity of the coating.	been updated to reflect a 30-mil polypropylene liner as the primary secondary containment. No credit will be taken for any sealant that may be applied to the floor of the TAN-607A High Bay.

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34	Appendix C EDF-1004 Sec. 3.2 1 st Parg.	4 of 10	Please consider modifying the text to reflect the additional height of the concrete wall discussed in our 6/03/04 conference call.	Comment Incorporated. The perimeter and the height of the shield walls has been changed based on final shielding configuration and specified in revised EDF-PEI-1004.

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DATE: 06-04-04

REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1	6.2		Section 6.2, which describes the remedial action work tasks, should include more detail. For example, in the meeting on May 19, 2004, a test lift of the tanks was discussed, in which the tanks would be lifted a few inches off the cradles and held for 10 minutes. However, this information is not included in the work plan. Specific examples of information that should be included in the work plan are described in the specific comments below; however, these are only a few of the details that should be included. Section 6.2 should be rewritten to include much more detail regarding the remedial action tasks.	Comment Noted. Additional detail added as documented in resolutions to specific EPA comments identified below and comments received from DEQ.
2			Information regarding soil conditions at the project site, such as the project Geotechnical Investigation Report, are required to make a thorough geotechnical assessment of the work plan. This review should be considered preliminary until such information can be provided.	Comment Incorporated. EDF-PEI-1000 was provided on 05/26/04, at request of the Agencies, following submittal of the Draft RD/RAWP. This EDF summarizes (as an attachment) available geotechnical data for the TSF-26 site. EDF-PEI-1000 has been included in the final RD/RAWP.
SPECIFIC COMMENTS				
1	1.3 3 rd Bullet	1-11	EPA recommends that the bullet be rewritten to read “Confirmation sampling of the sand in the cradle will be performed to determine . . . If the cradle is removed to address RCRA concerns then the soil under the cradle will be sampled to determine whether the Cs-127 concentrations are such that institutional controls are required.”	Comment Noted. The bullets in this section are an overview of the remedial action approach. Section 4 and Section 6 provide more detail and include the contingency of sand and cradle removal.
2	1.3 4 th Bullet	1-11	EPA recommends that the bullet be rewritten to read “Tank contents may be treated (as necessary) within TAN using thermal desorption...”	Comment Incorporated. Bullet changed to read, “Tank contents may be treated (as necessary) within TAN using thermal desorption...”
3	2.1.2 Last Bullet	2-2	It is EPA’s understanding that the piping is to be removed. This bullet should be rewritten to reflect this change.	Comment Noted. This bullet identifies the closure performance standards specified in the HWMA/RCRA closure plan. The RD/RAWP identifies in subsequent sections that the piping will be removed and disposed.

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4	Table 2-1	2-3, 2-4, & 2-5	<p>It is not clear if each bullet in the Implementation Approach column should have Performance Criteria associated with it. If so that is not the case.</p> <p>On Page 2-4, there are two bullets in the Performance Criteria column that state “Completed as stated”. It is not clear what performance criteria “completed as stated” represents. A footnote or additional explanation should be provided.</p> <p>On Page 2-5, in the Implementation Approach column, the first part of the sentence up to “sampling will be performed” is not clear and should be rewritten.</p>	<p>Comment Noted/Incorporated. Generally each bullet in the Implementation Approach column will have a corresponding bullet in the Performance Criteria column; however, there are a few exceptions. The table has been revised per DEQ specific comment 8 to horizontally align the information in each column.</p> <p>For comment on Page 2-4: Some elements of the ROD remedy do not lend themselves to quantitative performance criteria. These were identified as “completed as stated”. To more clearly convey this “Completed as stated.” will be replaced with “Implemented as stated. No quantitative performance criteria are appropriate for this element.”</p> <p>Some elements of the ROD remedy apply to Phase 2 contents treatment and disposal. Where this is the case, the statement under “Performance Criteria” will be revised to state “Note: Performance criteria will be identified in RD/RAWP Addendum 2.”</p> <p>For comment on Page 2-5: A comma was missing from the implementation approach statement for item 9), b). With the missing comma inserted the sentence now reads “For soils more than 3 m (10 ft) bgs, that is not beneath the PM-2A tank system tanks or piping, sampling will be performed within the excavation to determine the need and time for ICs.” Also, “soils” has been changed to “soil” on all of the item 9) implementation approach statements.</p>
5	4.3.2 3 rd Parg.	4-3	<p>It is not clear why there are different compaction requirements for the transfer road (90%) and the crane pad (95%). Please explain.</p>	<p>Comment Noted. Compaction of the crane pad is the most critical of the requirements specified. The additional compaction is necessary to ensure that the crane does not shift or tilt during lifting operations. A lesser compaction requirement is specified for the transfer road as the impacts of any settling are not as critical to the heavy hauler as they are to the crane.</p>

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6	4.3.2	4-3 & 4-4	This section describes the excavation procedures for tank removal. The slope stability analyses, Document PEI-EDF-1000, is referenced but is not included in the section. This document should be provided to allow for verification of the design slopes.	Comment Incorporated. PEI-EDF-1000 has been included in Appendix C.
7	4.3.2 & 6.2.2.2	4-3 & 6-9	a) These sections describe the excavation procedures for tank removal and indicate that during sand pad removal activities sand will be monitored to determine radiation levels. However, the frequency and type of monitoring is not discussed. The type and frequency of sand pad monitoring should be provided.	a) Comment Incorporated. Last sentence of the second paragraph of Section 4.3.2 changed to read, “During sand pad removal activities, data will be collected to determine whether there is evidence of a release from the tank. Data points may include visual inspection of the sand for staining, radiological surveys of the sand following removal (i.e., surveys of the surface of waste boxes), and other radiological samples, as determined practical.” Third note in Section 6.2.2.2 changed to read, “Special Note: During sand removal visually monitor sand for staining or discoloration. Following sand removal perform radiological monitoring of the sand and collect other radiological samples, as determined practical. (This action...”
			B) In addition, these sections indicate that tank wall thickness measurements will be taken at critical locations on the tanks (e.g., the lifting pad locations and the sludge/air interface where corrosion of the tank wall would be anticipated). This inspection should include any information regarding the tanks that has been observed during sand pad removal or through an additional assessment to determine the likelihood of corrosion and the need for measurement at other locations.	b) Fifth paragraph of Section 4.3.2 changed to read, “Immediately following or prior to tank excavation the PM-2A tanks will be inspected to determine tank wall thickness at critical locations (locations of lifting pads, sludge/air interface where the most corrosion of the tank wall would be expected, and other areas where, based on observations during tank excavation or sand pad removal, integrity of the tanks may be in question).” Bullet No. 11, Section 6.2.2.2 changed to read, “Perform tank wall thickness measurements at critical locations on the tanks (locations of lifting pads, sludge/air interface where the most corrosion of the tank wall would be anticipated, and other areas where, based on observations during tank excavation or sand pad removal, integrity of the tanks may be in question.”

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8	4.3.3	4-4 & 4-5	This section describes the High Bay preparations. Increasing the load on the foundation soils could potentially cause damaging settlements or bearing capacity failure. Therefore, the load bearing capacity of the soil supporting the High Bay floor slab should be evaluated to include the proposed increase in structural load and documented in a design memorandum or letter report. This documentation may be as simple as comparing the maximum past loading on the slab to the proposed new loading.	Comment Noted. The structural calculations for the bearing capacity of the TAN-607A High Bay, as documented in EDF-PEI-1007 (included in Appendix C), do not rely on the geotechnical properties of the underlying soils. The TAN-607A structure is constructed of cast-in-place concrete slabs, grade beams and drilled concrete piers. For information, the TAN-607A High Bay was configured such that the HTRE-2 and HTRE-3 engines (maximum weight of approximately 300 TON) could be moved to high bay in the same area where the PM-2A tanks will be stored.
9	4.3.4	4-5	This section describes the tank lifting process and indicates that finite element analysis calculations for the lifting design are being completed to determine the necessary tank thickness required to safely lift the tanks. The section does not indicate when these calculations will be completed. These calculations should be completed and included as part of the final work plan.	Comment Incorporated. Section changed to read that finite element analysis calculations have been completed to determine the necessary thickness required to safely lift the tanks. The finite element analysis (Calculations No. ST-468) has been included in Appendix C.
10	4.3.4 3 rd Parg.	4-5	Additional information should be provided explaining how the residual soil/sand will be removed from the tanks.	Comment Incorporated. Removal techniques will be dependent upon the potential for airborne contamination. Paragraph changed to read, "... will be removed using appropriate decontamination methods as described in the Decontamination Plan (INEEL 2004b)."
11	4.3.6 1 st Parg. Last Sentence	4-6	EPA recommends the following rewrite, "... at the ICDF or another facility approved by the Agencies."	Comment Incorporated. Sentence changed to read, "... at the ICDF or a non-INEEL facility (see Waste Management Plan; Section 3.4.2)."
12	4.3.7	4-6	This section describes the excavation backfill and contouring. Documentation of proper engineering backfill and compaction efforts will be essential in evaluating the engineering quality of the fill should this site be redeveloped in the future. Engineering backfill and compaction requirements should be provided for all anticipated construction activities (i.e., structural and trench backfill); likewise, thorough documentation of the backfill and compaction effort during construction should be required. Documentation of field conditions, such as proper clearing, grubbing, and identification and removal of undesirable	Comment Noted. Backfill of the TSF-26 site is not driven by future redevelopment of the site. The purpose of the backfill is to minimize subsidence of the site and to match the grade of the surrounding area such that the site can be revegetated. Specifications for backfill of the site, which include type of backfill, placement of backfill, compaction, and topsoil placement are provided in Construction Specification 475, Section 02200 – Earthwork (Attachment 2).

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			materials and unstable soils, as well as proper backfilling and compaction should be performed.	
13	5 1 st Parg. Last Sentence	5-1	Please provide EPA a copy of latest QAPjP. It is unclear based on discussions with Idaho DEQ whether this document has been revised per Agencies' comments. Documentation indicating the resolution of these comments should also be provided.	Comment Incorporated. Incorrect reference. Reference has been changed to Revision 8, the most current approved revision of the QAPjP. A copy of the revision 8 was sent to the Agencies 6-11-04.
14	6.2.1.3	6.5	This section describes mobilization and states, "Existing site access roadways will be used where possible; additional temporary roadway construction will occur as specified." The section however does not refer to a drawing which illustrates these roadways. This section should reference a drawing which shows the existing and temporary roadways to be used for this project.	Comment Noted. This section is a general description of mobilization activities. The sequencing sketches provided in Appendix G show the transport path from the TSF-26 site to the TAN-607A High Bay. Necessary improvements to the TSF-26 site (i.e, crane pad, transfer road) are specified on the tank excavation drawing (P-FFA/CO-PM2A-001; Attachment 1), which is called out in Section 4.3.2. Also, the first paragraph of Section 6.2 notes that "The applicable drawings and SPCs are provided in Attachments 1 and 2."
15	6.2.1.4, 6.2.1.6, 6.2.1.7, & 6.2.1.11	6-5, 6-6, & 6-7	These sections describe clearing and grubbing, soil excavation, earthwork, and excavation backfill respectively. "SPC 475" is referenced in these sections; however, it is not provided. A copy of reference SPC 475 is required for verification of the recommendations.	Comment Noted. Specifications are included in Attachment 2 to the RD/RAWP Addendum. The first paragraph of Section 6.2 notes that "The applicable drawings and SPCs are provided in Attachments 1 and 2."
16	6.2.2.12 Bullet	6-13	EPA requests SPC 475, subdivision 02200	Comment Noted. Specifications are included in Attachment 2 to the RD/RAWP Addendum.
17	6.2.2.18 1 st Parg.	6-14	EPA requests SPC-475, subdivision 02486. If the requested subdivision does not state what the "Native Grasses Mix" is please provide that information as well.	Comment Noted. Specifications are included in Attachment 2 to the RD/RAWP Addendum.

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18	6.4 2 nd Parg.	6-16	It appears that the proposed outline for a Remedial Action Report is missing some components. Compare the bullets in this section to OSWER Directive 9320.2-90A-P, Exhibit 2-3 (provided) and insure that all the items in the exhibit are addressed in the Remedial Action Report for this site.	Comment Noted. The content of this section is the same as the original Group 3 RD/RAWP and is based on the requirements in the FFA/CO Action Plan Section 2.13 and Section 6, Remedial Action Report, of the RD/RA Guidance for the INEL. Also, other INEEL RA reports will be used in developing the content and outline of the reports for OU 1-10.
19	7.1	7-1	This section indicates that the PM-2A tanks remedy was modified in the OU1-10 ROD amendment. However, the PM-2A tanks remedy was actually changed with an explanation of significant difference (ESD). For clarity, the section should indicate that the PM-2A remedy was changed with an ESD.	Comment Incorporated. Last sentence, 1 st paragraph changed to read, "... subsequently changed in the OU 1-10 ROD amendment and ESD for the PM-2A tanks (DOE-ID 2004a)."
20	8	8-1	It is recommended that the process for the Five Year Reviews found in Section 8 of the original Group 3 RD/RA Work Plan be reviewed. Any proposed changes, such as submittal date of the Five Year Review and/or whether the WAG 1-10 Five Year Review is to be a stand alone document should be noted in this section of this document, i.e. Addendum 1, RD/RA Work Plan.	Comment Noted. Discussion has been initiated on revising the submittal date. A proposed change in the submittal date was sent via email on 6-2-04. As noted in this email, it was recommended that agreement on the submittal date and incorporation into the INEEL site-wide five year review process could be incorporated into the PM-2A Tanks Addendum 1 or the V-Tanks Addendum 2. Based on current schedules, recommend the agreement be incorporated into the V-Tanks Addendum 2.
21	Appendix A	A-6	This appendix provides a table which describes compliance with regulatory requirements. The implementation strategy for the citation, General Inspections, IDAPA 58.01.05.008, (40CFR 264.15) indicates that "... the TAN-607A High Bay system will be inspected on a regular basis." The term regular basis is vague; a specific frequency should be cited.	Comment Incorporated. Deleted, "The remediation area will be inspected daily. The inspection checklist will be included in the INEEL work package documentation" from the implementation strategy. Implementation Strategy changed to read, "Once placed in the TAN-607A High Bay general inspections will be conducted on a weekly basis..."

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22	Appendix B Methods and Assumptions number 4	7	For comparison with short-term emission limits (e.g., pounds per hour [lb/hr]), it was assumed that the entire tank waste volume could be processed in 240 hours. This amounts to treatment at 43 gallons per hour. It is unclear why was this rate chosen. An explanation for this rate should be provided. If it is an arbitrary limit, it effects a low rate of emissions. If there is a physical limitation or some other reason it should be stated.	<p>The Air Pollutant Emissions Calculations and Assumptions section of the Air Permitting Applicability Determination presented in Appendix B of the RD/RA WP Addendum 1 provides the bounding calculation for all phases of the PM-2A project. These calculations would bound a worst case scenario for a release of the entire contents of the PM-2A tanks during Phase 1. No release is anticipated during Phase 1 as all penetrations to the tanks have been sealed with airtight plugs. The APAD will be reevaluated for the Phase 2 treatment portion of the project and modified, as necessary, if different than the 240 hours presented in the current APAD. The 240 hours was a best-case estimate (most optimal) of in-tank treatment for the PM-2A Tanks.</p> <p>The following write-up has been added as the last paragraph to Section 5 of the RD/RA WP Addendum 1:</p> <p>“The need for an air permit was evaluated in an Air Permitting Applicability Determination (APAD) (see Appendix B). This APAD was based upon the maximum predicted emission rate during the entire remediation project, which would be expected during the actual treatment process. Estimated emissions during the Tank Removal and Site Remediation Phase would be bounded by emissions levels assessed for the treatment phase. The APAD determined that no permitting was necessary for any phase of the operations.”</p>
23	Appendix C	PEI-EDF-1004	The text of this section describes the secondary containment that will be installed in the High Bay. The file does not include a description of the liner and the liner installation. In the system elements section of the design file a section should be included that describes the liner and the liner installation.	Comment Incorporated. EDF-PEI-1004 has been updated to reflect a 30-mil polypropylene liner as the primary secondary containment. No credit will be taken for any sealant that may be applied to the floor of the TAN-607A High Bay.

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24	Appendix C	PEI-EDF-1006	This section indicates in the introduction and purpose that the calculations provide “independent verification of the preliminary weight calculations completed by Intrepid Technologies & Resources Inc., and estimated maximum tank weights specified . . .” by Bechtel BWXT Idaho, LLC. However, these previous calculations are not included. For comparison these previous tank weight estimates should be included in this calculation.	Comment Noted. Section 1 of the EDF states, “This engineering design file (EDF) evaluates the weight of the PM-2A tanks (V-13 and V-14) for purposes of lifting them from their current location in the TSF-26 site and placing them on a transporter, transporting them to the TAN-607A High Bay, and placing them in storage.”. As stated in Section 1, the EDF also provides an independent verification of the <i>preliminary</i> weight calculations completed by... and <i>estimated</i> maximum tank weights specified in...” This EDF is the basis for the design. For information, maximum tank weight as estimated by previous contractor was 112,722 lb. INEEL estimate of maximum weight is 58 ton (116,000 lb).
25	Attachment 1 & Attachment 2	Design Dwg. & Specs.	An index of drawings and specifications is not included. Both of the attachments should have an index. It appears that all of the specifications for the project have not been included as part of Attachment 2. For example, the specifications for the summary of work or welding are not provided. If an index of the specifications for the project is provided, it should be a complete list and denote which specifications are not included but available by request. This should also be done for the drawings for the project.	Comment Incorporated. An index has been added to Appendix C, Attachment 1, and Attachment 2. Specifications included in Attachment 2 are those under which surveying, earthwork, and revegetation will be conducted and provide specific requirements for these activities. The specifications are not intended to identify all codes and standards under which specific activities (i.e., welding) will be conducted.

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26	Attachment 2	Spec. 02140	Temporary Diversion and Control of Water During Construction. This specification discusses storm water control. A Storm Water Pollution Prevention Plan (SWPPP) is mentioned in the Materials section of the specification (page 2). However, the SWPPP is not included in the References section (page 1) or the Submittals section (page 1) of the specification. The Submittals section requires storm water control procedures to be submitted. It is unclear if this plan is a required submittal or a referenced document. The reference to the SWPPP in the materials section should be removed or clarified. The terms “extreme” and “promptly” are used in this specification. The meanings of extreme and promptly are vague. The definition of an “extreme” storm event should be provided, including inches of rainfall in a specified time. “Promptly” should be replaced by an exact time frame within which to complete activities.	<p>Comment Noted. Specification Section 02140 has been deleted from Attachment 2. Based on negotiations with the EPA and the Army Corps of Engineers, Storm Water Pollution Prevention Plans are not required for industrial or construction activities at the INEEL because the INEEL is not located within a storm water corridor.</p> <p>Section 6.2.1.8 has been revised to state:</p> <p>“6.2.1.8 Storm Water Control</p> <p>Storm water will be controlled during remedial action so that storm water does not carry contamination from the contaminated site to adjacent non-contaminated areas. Storm water will be managed to minimize flow either onto or off of the site. Storm water may be left to infiltrate the soil. Because the TSF area at TAN is outside the storm water corridor, a storm water pollution prevention plan is not required.</p>
27	Attachment 2	Spec. 02200	Earthwork, Page 4, Placement. This part of the specification indicates that “No water shall be used for placing, settling, or compacting backfill or fill except to obtain optimum moisture content.” However, this does not include the potential use of water for dust control. This statement should include the use of water for dust control.	<p>Comment Noted. This specification is for earthwork activities only and does not specifically address dust suppression activities. As stated, “No water shall be used for placing, settling, or compacting backfill or fill except to obtain optimum moisture content.”</p>

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GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	PEI-EDF - 1002	Appendix C	The Dust Suppressant EDF provided in Appendix C needs to be revised to provide the information on the type and application method of the dust suppressant that will be used for the excavation.	Comment Incorporated. EDF updated to reflect application of ProGuard SB or other appropriate dust suppression methods, as deemed necessary during field activities.
2	PEI-EDF-1004	Appendix C	The Secondary Containment needs to be revised such that the drawing and the text agree with the latest plans for secondary containment within the High Bay. The text provided with the RD/RAWP indicates epoxy paint on the floor with hazardous waste pigs. The drawing indicates the use of a liner for secondary containment.	Comment Incorporated. EDF-PEI-1004 has been updated to reflect a 30-mil polypropylene liner as the primary secondary containment. No credit will be taken for any sealant that may be applied to the floor of the TAN-607A High Bay.
3	EDF-1005	Appendix C	Update to discuss actual concrete shielding dimensions, rad levels from the tank survey, and revision in the area of the entrance to the shielded area at the south west corner.	Comment Incorporated. The perimeter and the height of the shield walls has been changed based on final shielding configuration and specified in revised EDF-PEI-1004.
4	Remedial Action Cost Estimate	Appendix D	Revise to reflect latest costs.	Appendix D has been revised to reflect updated cost information for the remedial action.
5	Sequencing Sketches	Appendix G	Revise Sheet 4 of the Sequencing Sketches to show tank V-13 as being parked within the High Bay and not through the back wall.	Comment Incorporated. Sheet 4 revised to correctly show placement of first tank in the TAN-607A High Bay.
6	Final Grading Plan	Attachment 1	Review original RD/RAWP submittal and basis and revise as necessary	Comment Incorporated. Drawing C-6, C-7, C-8, and D-3 removed from package and replaced with new drawing showing final grade to match surrounding grade. Installation of subsurface culvert removed. Corresponding changes made to Sections 4 and 6 of the RD/RAWP.

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7	Storm Drain Detail Drawing	Attachment 1	Review original RD/RAWP submittal and basis and revise as necessary.	Comment Incorporated. Drawing C-6, C-7, C-8, and D-3 removed from package and replaced with new drawing showing final grade to match surrounding grade. Installation of subsurface culvert removed. Corresponding changes made to Sections 4 and 6 of the RD/RAWP.
8	P-FFA/CO-PM2A-001	Attachment 1	Clarify fill and compaction details (i.e., compacted depth)	Comment Incorporated. Revised drawing included that specifies minimum final compacted thickness of 6-in.
9	P-FFA/CO-PM2A-004	Attachment 1	Submit revised drawing to reflect shielding changes, shadow wall changes, etc.	Comment Incorporated. Drawing updated to show the revised perimeter and the height of the shield walls based on final shielding configuration and specified in revised EDF-PEI-1004.
10	1.3	1-11, 3 rd bullet	Clarify that this bullet applies to subsurface (i.e., < 10 ft bgs) soils.	Comment Noted. This summary bullet is correct as written. The soil confirmation sampling (for all soil remaining at the site) will identify the concentrations of Cs-137 for both surface soils (0 to 10 ft bgs) and soil under the PM-2A Tanks (10 ft and more bgs).
11	Table 2-1	2-5/6; Implementation Approach 9	Clarify that surface soil samples are being collected under Group 1 Soils RD/RAWP and associated FSP; subsurface soil samples (i.e., < 10 ft bgs) collected under this RD/RAWP Addendum and associated FSP.	Comment Noted. Table 2-1 addresses ROD elements at a higher level. This comment will be addressed in Section 6.2 per resolution to comment 12 below.
12	6.2.2.10	6-12	Same as comment 11 above.	Comment incorporated. Revise this section to add the following additional note. <i>“Special Note: After tank removal (and concrete cradle and sand pad removal, if necessary) is completed, also perform confirmation sampling on the tank excavation areas that are from 0 to 10 ft bgs in accordance with the Group 1 FSP (DOE-ID 2004f).”</i>

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13	Drawing C-2	Attachment 1	Revise the piping isolation point to correspond to the location shown in the PM-2A Tanks RCRA Closure Plan and to incorporated changes in pipe capping per field change currently in progress.	Comment Noted. Document Action Request (DAR) (DAR No. 111491) was initiated in system to document changes to line that was isolated using expansion plug instead of welding on metal caps.
13	Table 2-1	2-3	The heading for the first column is “ROD Remedy Element/Criteria”. The term “criteria” may be confusing with respect to the last column heading of “Performance Criteria”.	Comment Incorporated. Heading for the first column revised to delete the word “criteria”, to simply read “ROD Remedy Element”.
13	Table 2-1 Element 1)	2-3	The stated performance criteria “A NLCID was developed based on sampling conducted as part of the original RD/RAWP completed as stated.” is not a complete sentence. Also, the reference to the RD/RAWP is not clear as to which RD/RAWP.	Comment Incorporated. The sampling was performed under the Group 1 RD/RAWP. The sentence has been revised to read, “Sampling was performed and a NLCID was developed under the Group 1 RD/RAWP for soil that was excavated and disposed of at RWMC in 2000.” as shown in the attached UL/SO copy of Table 2-1.
14	Table 2-1 Element 2)	2-3	The statements in the Implementation Approach and Performance Criteria columns provide information that does not directly match up with the ROD Remedy Element.	Comment Incorporated. Revised the Implementation Approach and/or Performance Criteria for element 2) to more closely match the remedy element/criteria. See changes to Table 2-1 for elements 2) as shown in the attached UL/SO copy of Table 2-1.
15	4.3.9	4-6	Section incorrectly references TSF-06.	Comment Incorporated. “TSF-06” changed to “TSF-26.”
16	4.3.7	4-6	First sentence should reflect backfill with clean soil.	Comment Incorporated. Sentence changed to read, “... recontoured with clean soil.”
17	4.3.5/PEI-EDF-1003	Appendix C	Update EDF based on completed fire hazard prevention analysis for TAN-607A High Bay.	EDF and Section 4.3.5 changed to incorporate placement of a fire-retardant cover over the tanks once placed in the TAN-607A High Bay.
18	4.5/4.6	Tables 4-3, 4-4, and 4-5	Update lists based on final design and incorporation of EPA/DEQ comments.	Tables have been updated.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Field Sampling Plan for Group 3, PM-2A Tanks for Test Area North, Waste Area Group 1, Operable Unit 1-10, DOE/ID-11078, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	1.1 1 st Parg.	1-1	Please indicate that the tanks and the waste may be disposed of as CERCLA remediation-derived waste at the INEEL CERCLA Disposal Facility (ICDF) only if the Waste Acceptance Criteria (WAC) is met.	Comment Noted. This section is a general description of the revised approach. Specific criteria for disposal of soils is addressed in the RD/RAWP and Waste Management Plan. Sampling data resulting from the sampling activities specified in this FSP will not be used for waste disposition. Additional sentence added to section reading, "Additional information on the PM-2A Tanks and planned remedial actions can be found in the RD/RAWP (DOE-ID 2004) and supporting documents (INEEL 2004a; INEEL 2004b)."
2	1.1 1 st Parg.	1-2	The next to last sentence states that "These soil samples, which will be analyzed for both HWMA/RCRA and radiological constituents, will be used as a basis to show that these soils meet the FRG specified in the ROD." The FRG serves as an action level, but Section 4.1.2 (second paragraph) states that "...no decision(s) will be made during confirmation sampling directly from the data and the data are not being compared directly to established numerical values (Als)." These statements appear to represent a contradiction. Please discuss.	Comment Noted. The soils samples referred to in this paragraph are those collected under the Contingent FSP associated with the HWMA/RCRA closure plan. As stated in the last sentence, if soil contamination (during HMWA/RCRA closure sampling) is identified that exceeds the FRGs, this (Group 3 PM-2A Tanks) FSP will be modified to address the identified area(s) of concern.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Field Sampling Plan for Group 3, PM-2A Tanks for Test Area North, Waste Area Group 1, Operable Unit 1-10, DOE/ID-11078, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
3	1.1 Last Parg. 2 nd Sentence	1-2	There is the possibility that the CERCLA confirmation sampling may indicate that no soil is contaminated, or only a relatively small amount of Cs-137 contaminated soils may have to be removed from >10 feet bgs. The site would be then be eligible for free release and would not require Institutional Controls (ICs). It is recommended that this scenario be discussed in this section, or if not thought to be likely, please explain.	Comment Noted. Based on the ROD remedy only soil that exceeds the FRG of 23.3 pCi/g requires excavation [see item 2 in Table 2-2, Section 2.2 on page 2-3]. The Group 1 surface soil at both the TSF-06 site and the TSF-26 site had been remediated to this requirement and confirmation sampling is nearly completed. By using this approach specified in the ROD, there is no requirement to continue excavation to a free release level of 2.3 pCi/g. Consequently the RD/RAWP has been written acknowledging that institutional controls will be required for 100 years, which is the timeframe for Cs-137 to decay from the FRG of 23.3 pCi/g to the free release level of 2.3 pCi/g. Likewise, since institutional controls are required, there is no reason to include a discussion on free release of the site.
4	2.1 1 st Parg. 3 rd Sentence	2-5	Both the "F001-listed, hazardous sludge", and the "diatomaceous earth" are contaminated with volatile compounds and radionuclides. The sentence is written as if only the diatomaceous earth is contaminated by VOCs and radionuclides.	Comment Incorporated. Sentence changed to read, "The tanks currently contain F001-listed (chlorinated solvents, primarily perchloroethylene and trichloroethylene) mixed waste contaminated with radionuclides and heavy metals."
5	2.2 3 rd Parg.	2-5	Briefly describe the extent of the 1995 soil removal, and why more contaminated soil was not removed during this non-time-critical removal action.	Comment Noted. This is a brief summary of previous investigations conducted at the TSF-26 site. Additional detail with regard to all previous sampling activities does not provide added value to the confirmation sampling that will be conducted under this FSP. Sentence added to Section 1 referencing RD/RAWP and other supporting documents.
6	2.2 5 th Parg.	2-5	It has been almost one year since this sampling event. The results from the analysis should be available. Please include a summary and/or indicate where the detailed results can be found.	Comment Incorporated. Reference to data transmitted to the Agencies has been included.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Field Sampling Plan for Group 3, PM-2A Tanks for Test Area North, Waste Area Group 1, Operable Unit 1-10, DOE/ID-11078, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
7	4.1.5 Last Parg.	4-2	<p>The first sentence states "...confirmation sampling will be conducted to quantify the residual concentration of Cs-137 in order to determine the appropriate application of ICs." This indicates that, for example, one concentration indicates one level of ICs and another concentration leads to a different IC. By using randomly sampled data collected from throughout the grid, a conclusion will be arrived at that the data collected at these few points applies to the soils everywhere within the grid. This statistical inference is going to have to be made at some level of confidence and the design should specify the confidence limit.</p> <p>General comment; the DQO section needs to be include more information in light of the fact that decisions are being made and statistical inferences will be made, so the statistical aspect of the DQO sampling plan needs to be addressed in more detail. Also, the DQO process normally has seven steps, the final one being the iterative loop of "what are you going to do if your sampling shows that concentrations are above FRGs?"</p>	Comment Noted. Sampling approach in section 4 has been changed to be consistent with that used for the TSF-06 and TSF-26 Group 1 sites.
8	4.1.5 Last Parg.	4-3	The first sentence of the paragraph is incomplete, and the remainder or intent of the rest of the discussion is not clear. Please revise, or be prepared to discuss.	Comment Noted. Sampling approach in section 4 has been changed to be consistent with that used for the TSF-06 and TSF-26 Group 1 sites.
9	Figure 4-1	4-4	As discussed in the conference call of May 19 th , please add color to the figure, or differentiate in another way, to define the interior boundaries of the cradles. As it stands now, the grid lines overshadow the limits of the cradles.	Comment Incorporated. Figure updated to more clearly define the tank cradles and sampling approach.

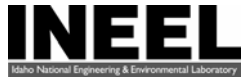


PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Field Sampling Plan for Group 3, PM-2A Tanks for Test Area North, Waste Area Group 1, Operable Unit 1-10, DOE/ID-11078, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	2.2	2-5	This section describes previous investigations and indicates that the contents of the PM-2A tanks were sampled in summer 2003 for characterization and disposal information. The results of these samples or a reference of where the results can be found should be included in this section.	Comment Incorporated. Reference to data transmitted to the Agencies has been included.
2	4.1	4-1 & 4-3	This section provides the data quality objectives (DQOs) and indicates that, “. . . no decisions will be made during confirmation sampling directly from the data and that the data are not being compared to established numerical values,” leading to the conclusion that a principal study question, alternative actions, decision statements, and decision inputs are not required. This is not accurate. The data will be used to determine institutional controls that are protective of human health and the environment; therefore, the principal study question should ask what levels of Cs-137 will be left onsite and how will these levels affect institutional controls. While this decision is not being made immediately, the data will eventually serve this purpose and this section should reflect this. Section 4.1 should be modified and EPA’s 2000 <i>Guidance for Data Quality Objectives Process (EPA QA/G-4)</i> should be used for reference.	Comment Noted. Sampling approach changed to be consistent with that used for the TSF-06 and TSF-26 Group 1 sites.
3		4-3	EPA recommends that the confirmation sampling be performed in a similar fashion to the soil confirmation sampling for TSF-06/26. That is, the area should be screened with a high purity germanium detector followed by biased-based confirmation sampling of at least 20%.	Comment Incorporated. Sampling approach in section 4 has been changed to be consistent with that used for the TSF-06 and TSF-26 Group 1 sites.



PROJECT DOCUMENT REVIEW RECORD

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DATE: 06-07-04 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
4	Figure 2-1	2-2	What do the two “arrows” at Middle Butte and Eastern Butte represent?	Comment Noted. The “arrows” at the Middle Butte and Eastern Butte are shadows of the buttes that show up on the arial/satellite photo.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Field Sampling Plan for Group 3, PM-2A Tanks for Test Area North, Waste Area Group 1, Operable Unit 1-10, DOE/ID-11078, Revision 1, June 2004.*

DATE: 5-27-04 **REVIEWER:** DOE

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	1, Para 3	1-1	Reference to MCP-241 should be deleted and replaced with MCP-9439, Preparation for Environmental Sampling Activities, and TEM-104 (11/5/02), Template Model for Preparation of Characterization Plans.	Comment Incorporated. Reference updated.
2	5.2	5-1	Sampling boundaries of the excavation with relation to surface soils needs to be clarified.	Comment Incorporated. The following sentences have been added following the first sentence of the last paragraph, "The bottom of the excavation is defined as the horizontal surface area immediately surrounding the former location of the tanks as well as the side slopes of the excavation up to an elevation of 4771 (i.e., 10 ft below the original ground surface). This area may include the cradles and sand or if they are removed, the soils beneath their former location."
3	Fig. 4-1	4-4	Figure 4-1 needs to be modified to reflect changes in confirmation sampling and to reflect accurate elevation of the excavation shoulder that is at 4775. Also call out elevation of bottom of excavation.	Comment Incorporated. Figure updated.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Waste Management Plan for Group 3 PM-2A Tanks and Burn Pits for Test Area North, Waste Area Group 1, Operable Unit 1-10, INEEL/EXT-03-00284, Revision 1, June 2004.*

DATE: 06-07-04

REVIEWER: DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	1 1 st Parg.	1-1	It is not clear in this section what comprises Phase 1 activities and what exactly is Phase 2 of the remedial action. Immediately after mentioning Phase 1, the revised remedy is stated as removal of the tanks with the waste inventory in place, treating the waste inventory, and if necessary, disposing of the tanks as CERCLA remediation-derived waste. Phase 2 is not mentioned until the last sentence. Although Phase 1 and 2 are described later in Section 2, it is recommended the first paragraph be rewritten to clearly state what constitutes Phase 1 activities and what are the Phase 2 actions.	Comment Incorporated. Paragraph changed to read, "...This WMP has been revised to reflect changes that were made to the remediation strategy for the PM-2A tanks and specifically addresses Phase 1 remedial actions, which include tank removal and site restoration. Phase 2 remedial actions, which include waste treatment (as necessary) and final tank and waste disposition, will be addressed in a separate WMP associated with Addendum 2 to the Group 3 RD/RAWP."
2	3.2 2 nd Parg. 1 st Bullet	3-1	Briefly define "clean" and "contaminated" soil in this discussion or indicate where in the Waste Management Plan these terms are defined.	Comment Incorporated. Bullet deleted as it was not necessary to include in the WMP.
3	3.1 Tables 3-1 & 3-2	3-2 to 3-4	<p>a) Please consider adding a footnote to both of these tables that provides a data source reference(s) for the information presented in the third and last column of table 3-1 and the fourth and last column of table 3-2. For instance, it is unclear where the waste type determinations originate in each table (why PCBs are not expected in table 3-1; why low activity levels are mentioned in table 3-2 (burn pit) when no other indication (text reference) points to radioactivity being a concern in this area. (refer to section 3.4 for specific text).</p> <p>b) Although it is assumed that a majority of the waste will meet LDRs and no treatment is necessary there should be a footnote to indicate that wastes not meeting LDRs may require some sort of treatment to be disposed of properly.</p>	<p>a) Comment Noted. With regard to Table 3-2, The waste management plan is a revision of an existing, Agency-approved document. No changes were made associated with TSF-03 as the revision to the document only addresses the revised approach for the TSF-26 site. All remediation wastes generated as part of the remedial actions for the PM-2A tanks has the potential to be mixed waste that is F001-listed. The table is not intended to be inclusive of all COCs.</p> <p>b) Comment Incorporated. Footnote added to table that reads, "Wastes that do not meet LDRs will be treated, as appropriate, or shipped off-Site to another facility for treatment and disposal."</p>

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Waste Management Plan for Group 3 PM-2A Tanks and Burn Pits for Test Area North, Waste Area Group 1, Operable Unit 1-10, INEEL/EXT-03-00284, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
4	Table 3-1 Remove liquid from lines	3-2	If it is assumed that the liquid in the waste lines is similar to the waste in the tanks. The planned treatment/disposal (assume waste meets LDRs; no treatment required – ICDF) is inconsistent with the statement that the tank contents will be treated as necessary.	Comment Incorporated. Planned Treatment/Disposal entry changed to read, “Treatment, as required, and disposal to be conducted as part of Phase 2 remedial actions.”
5	Table 3-2 All remedial activities, LLW	3-4	It is recommended that the ICDF be added as a disposal location option in addition to the RWMC for LLW from all remedial action activities.	Comment Noted. The waste management plan is a revision of an existing, Agency-approved document. No changes were made associated with TSF-03 as the revision to the document only addresses the revised approach for the TSF-26 site.
6	3.2 Bullets 3 to 8	3-5	These bullets are redundant with the first six bullets of the section.	Comment Incorporated. Bullets deleted.
7	3.3 1 st Parg. Last Sentence	3-9	It should be noted that all wastes generated during the Phase 1 remedial actions are assumed to meet LDRs without treatment. The wastes in the PM-2A tanks will be treated under the Phase 2 remedial action.	Comment Incorporated. Sentence changed to read, “... that all waste generated, with the exception of wastes removed from the feed piping, will be accepted... ICDF WAC. Wastes removed from the feed piping will be treated, as necessary, and disposed as part of Phase 2 remedial actions.”



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Waste Management Plan for Group 3 PM-2A Tanks and Burn Pits for Test Area North, Waste Area Group 1, Operable Unit 1-10, INEEL/EXT-03-00284, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	2 Last Parg.	2-5	EPA recommends that the next to last sentence be rewritten to read, “no contaminants are left in place that pose an unacceptable threat to human health and the environment and to alleviate . . .”	Comment Incorporated. Reference to the ESD corrected.
2	3.2 3 rd Bullet	3-5	EPA recommends revising this bullet to reflect that the excavation will not be backfilled with the excavated soil.	Comment Incorporated. Bullet deleted.
3	3.4.5	3-12	Based on discussions regarding Argonne’s use of the CFA Landfill, it has been brought to EPA’s attention that an agreement in the fall of 2003 requires the CFA Landfill to notify the Health Board of what it is receiving. Providing such information should be included as one of the bullets on Page 3-12.	Comment Noted. The CFA Landfill is not required to provide notice to any agency on receipt of industrial waste that is non-radioactive and non-hazardous.
4	3.4.6	3-12	More information should be included about this site such as a more exact location (map?), more information of what material from CERCLA actions is anticipated to be disposed at this demo lanfill, and what advantages/disadvantages this site offers in comparison to the CFA Landfill.	Comment Noted. Section 3.4 provides a general description of facilities that may be used for waste disposition dependent upon characterization of the waste generated. Specific information on each of these facilities is not included. A design application for the TAN Industrial Landfill has been submitted to and approved by the State of Idaho. The design application includes a detailed description of the facility.
5	3.4.11.3 1 st Parg.	3-15	EPA recommends rewriting the last sentence of this paragraph to read; “. . . at the discretion of the WAG manager, with the concurrence of the Agencies (e.g. . . .”	Comment Incorporated. New sentence added to the end of the paragraph that reads, “Removal of large quantities of additional soils requires approval by the WAG manager and concurrence of the Agencies. Large quantities are defined as those that would entail multi-day extensions of the excavation project.”

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Waste Management Plan for Group 3 PM-2A Tanks and Burn Pits for Test Area North, Waste Area Group 1, Operable Unit 1-10, INEEL/EXT-03-00284, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
6	3.4.11.3 Item 5	3-16	EPA recommends that the item be rewritten to read, “. . . both the subsurface and surface soils can be backfilled with soils at the same concentration as the soils left in place.”	Comment Incorporated. Sentence changed to read, “. . . both the subsurface and surface soils can be backfilled with soils at the same concentration as the soils left in place.”
7	3.4.11.3 Item 6	3-16	EPA recommends that the item be rewritten to read, “. . . both of these areas can be backfilled with soils at the same concentration as the soils left in place.”	Comment Incorporated. Sentence changed to read, “. . . both of these areas can be backfilled with soils at the same concentration as those left in place.”
8	3.4.11.3 1 st Parg.	3-17	EPA recommends that the last sentence be rewritten as, “This confirmation sampling to determine the 95% UCL (based upon an approved FSP) . . .”	Comment Incorporated: Sentence will be modified to read “This confirmation sampling to determine the 95% UCL estimate of the population mean concentration (based upon an approved FSP) . . .”
9	3.4.11.3 1 st Parg.	3-17	EPA recommends that the last sentence be rewritten as, “This confirmation sampling to determine the 95% UCL (based upon an approved FSP) . . .”	Comment Incorporated. See Specific Comment No. 8 above.
10	Figure 2-1	2-2	What do the two “arrows” at Middle Butte and Eastern Butte represent?	Comment Noted. The “arrows” are shadows from the Butte’s themselves that show up in the satellite photo.
11	3.3 3 rd Parg.	3-9	The first sentence should be rewritten to read “. . . (CFR) 268.2 will (must?) be characterized . .	Comment Incorporated. Sentence changed to read, “. . . 268.2 will be characterized. . .”



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Waste Management Plan for Group 3 PM-2A Tanks and Burn Pits for Test Area North, Waste Area Group 1, Operable Unit 1-10, INEEL/EXT-03-00284, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** DOE

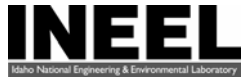
ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	Abstract	iii	Last line, first paragraph should reference a separate addendum to the RD/RAWP.	Sentence changed to read, "... in a separate addendum to the Group 3 remedial design/remedial action work plan."
2	1	1-1	Paragraph should clearly state that a separate addendum to the RD/RAWP will be prepared for Phase 2 PM-2A Tank remedial actions. Paragraph should specify that the treated waste will also be disposed.	Comment Incorporated. Paragraph changed to read, "...This WMP has been revised to reflect changes that were made to the remediation strategy for the PM-2A tanks and specifically addresses Phase 1 remedial actions, which include tank removal and site restoration. Phase 2 remedial actions, which include waste treatment (as necessary) and final tank and waste disposition, will be addressed in a separate WMP associated with Addendum 2 to the Group 3 RD/RAWP."
3	3.2	3-5	The first six bullets in this section are repeated.	Comment Incorporated. Bullets deleted.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Decontamination Plan for Group 3, TSF-26, PM-2A Tanks and TSF-03 Burn Pit for Test Area North, Waste Area Group 1, Operable Unit 1-10, INEEL/EXT-03-00283, Revision 1, June 2004.*

DATE: 06-05-04 **REVIEWER:** DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
SPECIFIC COMMENTS				
1	2. 2 nd paragraph 3 rd sentence	2-1	The text should contain a short explanation as to why the tanks were originally 14 ft below the ground surface and now are (or were, after the recent exhumation) approximately 9 ft below ground surface.	Comment Noted. This is a brief description of the system. Details are provided in the RD/RAWP. Additional sentence added to section reading, "Additional information on the PM-2A Tanks and planned remedial actions can be found in the RD/RAWP (DOE-Idaho 2004) and supporting documents (DOE-ID 2004b; INEEL 2004a)."
2	2. 3 rd paragraph	2-1	Please provide a reference(s) as to where the past and recent sampling data can be found.	Comment Noted. This is a brief description of the system. Details are provided in the RD/RAWP. Sentence added to Section 2 referencing RD/RAWP and other supporting documents.
3	2,1 3 rd paragraph	2-4	In light of the present activities at TSF-03, a suggestion would be to delete the paragraph. This information really serves no purpose now.	Comment Noted. The decontamination plan is a revision of an existing, Agency-approved document. No changes were made associated with TSF-03 as the revision to the document only addresses the revised approach for the TSF-26 site.
4	2.2.2	2-5	Similar to previous comment, much of the work described in this section has already been done.	Comment Noted. The decontamination plan is a revision of an existing, Agency-approved document. No changes were made associated with TSF-03 as the revision to the document only addresses the revised approach for the TSF-26 site.
5	3.2.1 last paragraph	3-3	The first sentence is not clear. Please explain why items to be disposed of as waste at ICDF would need to "...be considered decontaminated..."	Comment Incorporated. Paragraph deleted.
6	4.1.1 "Note" in box	4-1	a) This narrative is a little confusing as elsewhere in the document water spraying as a decontamination option for the tank exteriors is either briefly mentioned (Section 4.5.1) or omitted (Section 4.4.1). Please edit for consistency. b) In the last sentence, add "and will be removed and disposed at the ICDF."	Comment Incorporated. Note in Section 4.1.1 deleted. Reference to use of a water stream in Section 4.5.1 deleted.



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Decontamination Plan for Group 3, TSF-26, PM-2A Tanks and TSF-03 Burn Pit for Test Area North, Waste Area Group 1, Operable Unit 1-10*, INEEL/EXT-03-00283, Revision 1, June 2004.

DATE: 06-05-04 **REVIEWER:** DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
7	4.5.2 3 rd sentence	4-4	Sentence should begin with the word "If".	Comment Incorporated. Typographical error corrected.



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Decontamination Plan for Group 3, TSF-26, PM-2A Tanks and TSF-03 Burn Pit for Test Area North, Waste Area Group 1, Operable Unit 1-10, INEEL/EXT-03-00283, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1			It is not clear why the air sampling that will occur during excavation of the tanks is not described in the Field Sampling Plan (FSP) for the PM-2A removal. Some details regarding what, if anything, triggers this sampling and how it will be performed should be included in the FSP, or if not the FSP, in this plan and referenced in the FSP.	Comment Incorporated. No air sampling is planned during Phase 1 remedial actions. The only monitoring that will be conducted is IH and radiological monitoring, as determined necessary by facility safety and radiological personnel. First two sentences of paragraph deleted.
SPECIFIC COMMENTS				
1	2.2.2	2-5	This section describes remedial action at the TSF-03 Burn Pit and indicates that details of the remedial design are provided in Group 3 Remedial Design/Remedial Action Work Plan Addendum 1 for TSF-26, PM-2A Tanks - Phase 1 Tank Removal and Site Remediation . However, remediation of TSF-03 is not described in the this document. This reference should be corrected.	Comment Incorporated. This section incorrectly references the PM-2A RD/RAWP Addendum. Reference changed to the original Group 3 RD/RAWP under which TSF-03 remedial actions were conducted.
2	3.2.1	3-3	This section describes performance criteria for decontamination objectives at the PM-2A tanks. The performance criteria indicate that there should be no visible waste-related residue and no radioactive contamination above unrestricted release limits for items to be removed and reused. Additional contamination has been found in the area including trichloroethylene and tetrachloroethylene. However, the performance criteria do not address these contaminants. Additional performance criteria should be considered which address all contaminants found on site or additional information should be provided which justify the performance criteria provided.	Comment Noted. While other COCs exist, equipment used during Phase 1 remedial actions are not likely to contact the waste within the PM-2A tanks. Cs-137 is also the only constituent with an FRG at the site. Because of the mixed nature of the waste, radiological decontamination methods will also result in the decontamination of other COCs and is being used as the performance measure for decontamination. Radiological release criteria were chosen because such measurements are easily obtained and the results correlate to other potential COCs.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Decontamination Plan for Group 3, TSF-26, PM-2A Tanks and TSF-03 Burn Pit for Test Area North, Waste Area Group 1, Operable Unit 1-10, INEEL/EXT-03-00283, Revision 1, June 2004.*

DATE: 06-07-04 **REVIEWER:** EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
3	3.2.2	3-3 & 3-4	This section describes performance criteria for decontamination objectives at the TSF-03 Burn Pit. The performance criteria indicate that there should be no visible waste-related residue or stains and no radioactive contamination above unrestricted release limits for items to be removed and reused. However, lead is a primary contaminant of concern at the site, and the performance criteria do not address lead contamination. Additional performance criteria should be considered which address lead or additional information should be provided which justify the performance criteria provided.	Comment Noted. The decontamination plan is a revision of an existing, Agency-approved document. No changes were made associated with TSF-03 as the revision to the document only addresses the revised approach for the TSF-26 site.
4	4.4.1 1 st sentence	4-3	This sentence states that if airborne contamination is not a concern dry removal methods will be used. It is not clear how it will be determined if airborne contamination is not a concern. Such information should be provided.	Comment Noted. This is a decision that will be made by TAN radiological and safety personnel based on radiological and industrial hygiene monitoring, where applicable, and other factors such as wind speed. Sentence changed to read, "If airborne contamination is not a concern, as determined by TAN radiological and safety personnel, dry removal methods..."
5	4.4.3 1 st Parg.	4-3	It is not clear from text how the decon water will be contained. Such detail should be included.	Comment Incorporated. The following discussion has been added to the paragraph, "If wet decontamination methods are employed, resulting decontamination solutions will be collected for disposal. Collection methods may include such items as containment pans or construction of a lined decontamination pad, dependent upon the size of the equipment being decontaminated."
6	4.5.1	4-4	This section discusses the removal of debris from the outside of the PM-2A tanks via a semi-remote process. The text should provide more information as to what this action will be and how it will be performed in a manner that is "semi-remote."	Comment Incorporated. Sentence changed to read, "... semi-remote performance (e.g., long-handled brooms or brushes) will help..."
7	4.5.2	4-4	This section discusses having air monitoring equipment at designated locations. A map should be provided noting these locations. Also, the second sentence should read: "The air monitoring will consist of X numbers of high volume located per the map (Fig. #) and Y number of personal samplers for radionuclides . . ."	Comment Incorporated. No air sampling is planned during Phase 1 remedial actions. The only monitoring that will be conducted is IH and radiological monitoring, as determined necessary by facility safety and radiological personnel. First two sentences of paragraph deleted.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: *Decontamination Plan for Group 3, TSF-26, PM-2A Tanks and TSF-03 Burn Pit for Test Area North, Waste Area Group 1, Operable Unit 1-10*, INEEL/EXT-03-00283, Revision 1, June 2004.

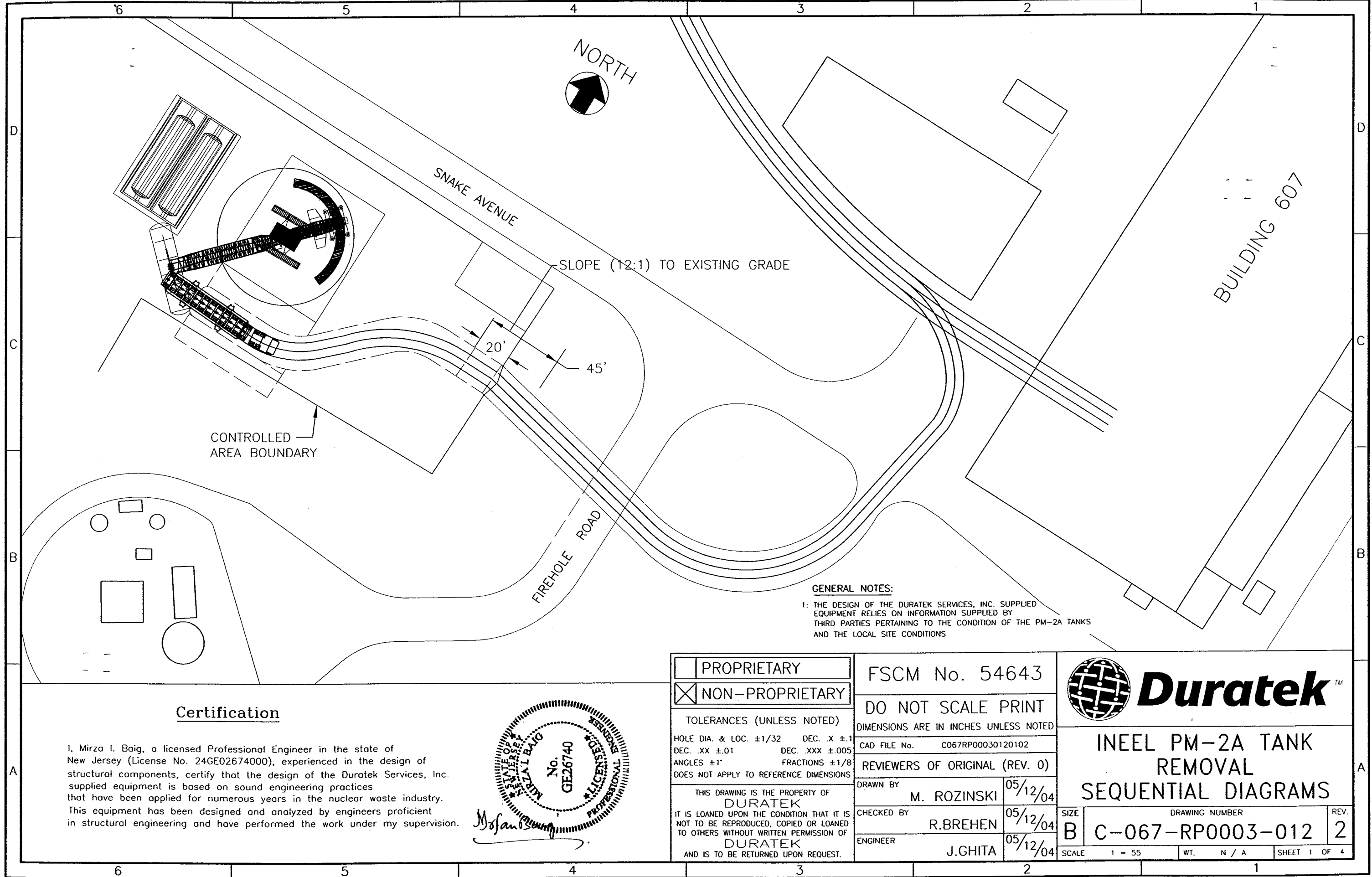
DATE: 06-07-04

REVIEWER: EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
8	2.2.1 1 st Parg.	2-4	The second sentence should read “. . . tanks, the waste inventory treated as necessary, . . .”	Comment Incorporated. Typographical error corrected.
9	4.5.2 Last Sentence	4-4	EPA believes the sentence should read “If wet decontamination methods . . .”	Comment Incorporated. Typographical error corrected.

Appendix G

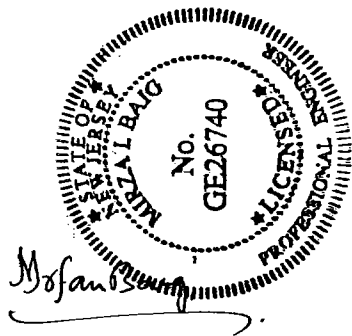
Sequencing Sketches



GENERAL NOTES:
1: THE DESIGN OF THE DURATEK SERVICES, INC. SUPPLIED EQUIPMENT RELIES ON INFORMATION SUPPLIED BY THIRD PARTIES PERTAINING TO THE CONDITION OF THE PM-2A TANKS AND THE LOCAL SITE CONDITIONS


Certification

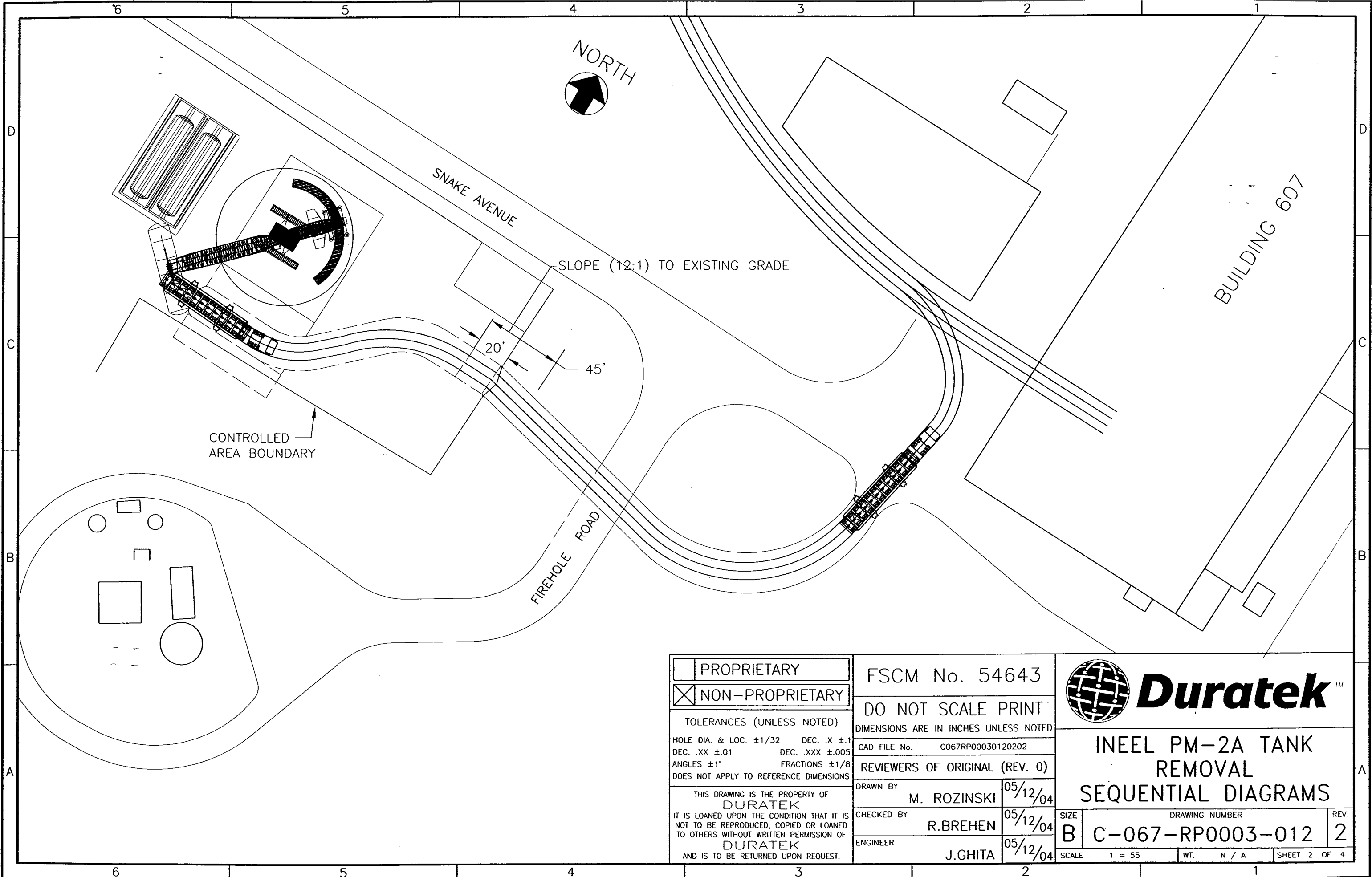
I, Mirza I. Baig, a licensed Professional Engineer in the state of New Jersey (License No. 24GE02674000), experienced in the design of structural components, certify that the design of the Duratek Services, Inc. supplied equipment is based on sound engineering practices that have been applied for numerous years in the nuclear waste industry. This equipment has been designed and analyzed by engineers proficient in structural engineering and have performed the work under my supervision.




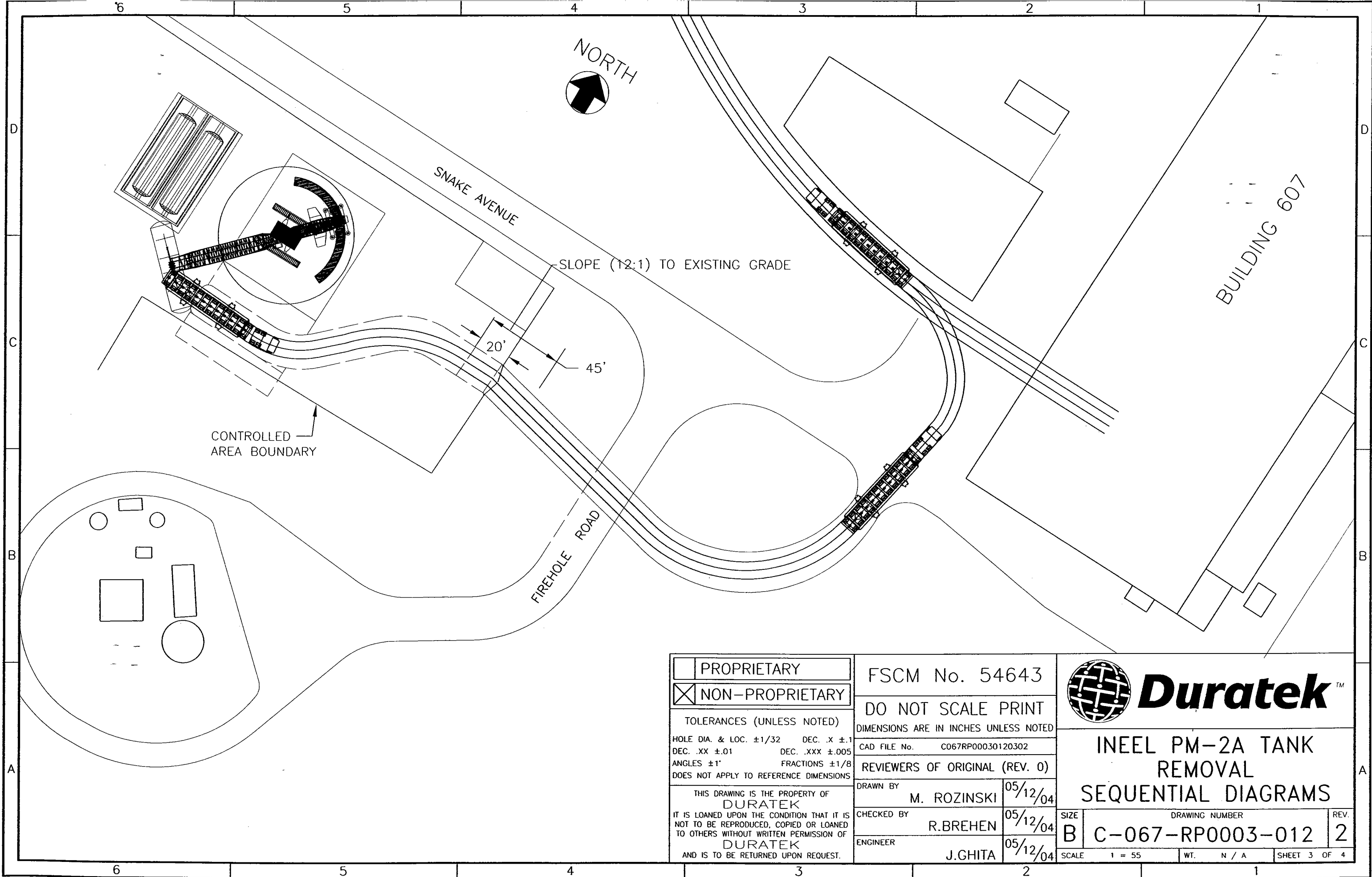
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<input checked="" type="checkbox"/> NON-PROPRIETARY	
TOLERANCES (UNLESS NOTED)	
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DEC. .XX $\pm .01$	DEC. .XXX $\pm .005$
ANGLES $\pm 1^\circ$	FRACTIONS $\pm 1/8$
DOES NOT APPLY TO REFERENCE DIMENSIONS	
THIS DRAWING IS THE PROPERTY OF DURATEK IT IS LOANED UPON THE CONDITION THAT IT IS NOT TO BE REPRODUCED, COPIED OR LOANED TO OTHERS WITHOUT WRITTEN PERMISSION OF DURATEK AND IS TO BE RETURNED UPON REQUEST.	


FSCM No. 54643	
DO NOT SCALE PRINT	
DIMENSIONS ARE IN INCHES UNLESS NOTED	
CAD FILE No.	C067RP00030120102
REVIEWERS OF ORIGINAL (REV. 0)	
DRAWN BY	M. ROZINSKI 05/12/04
CHECKED BY	R.BREHEN 05/12/04
ENGINEER	J.GHITA 05/12/04

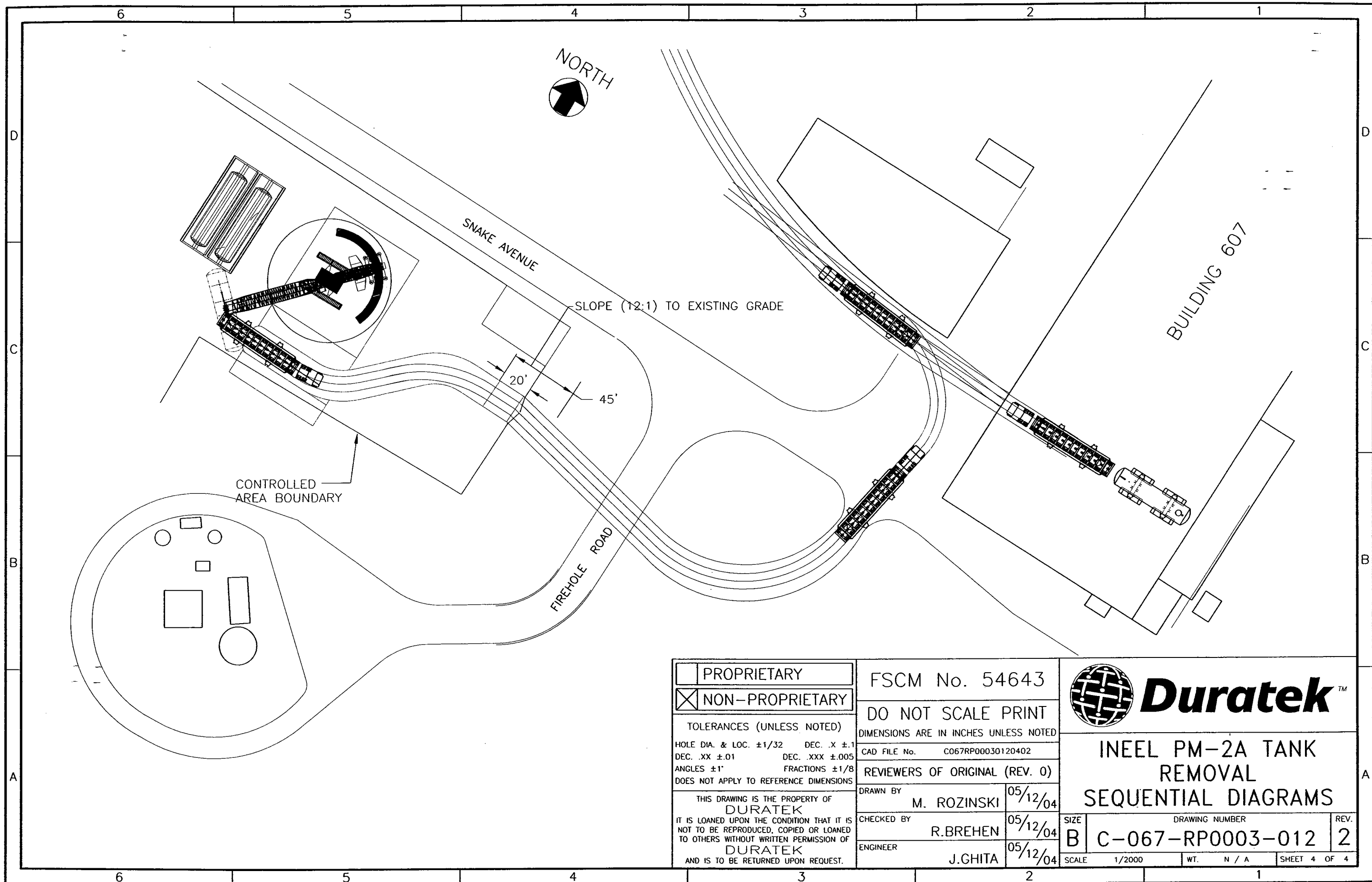
 Duratek TM	
INEEL PM-2A TANK REMOVAL SEQUENTIAL DIAGRAMS	
SIZE B	DRAWING NUMBER C-067-RP0003-012
SCALE 1 = 55	WT. N / A
SHEET 1 OF 4	




<input type="checkbox"/> PROPRIETARY <input checked="" type="checkbox"/> NON-PROPRIETARY		FSCM No. 54643		 Duratek TM	
TOLERANCES (UNLESS NOTED) HOLE DIA. & LOC. $\pm 1/32$ DEC. .X $\pm .1$ DEC. .XX $\pm .01$ DEC. .XXX $\pm .005$ ANGLES $\pm 1^\circ$ FRACTIONS $\pm 1/8$ DOES NOT APPLY TO REFERENCE DIMENSIONS		DO NOT SCALE PRINT			
THIS DRAWING IS THE PROPERTY OF DURATEK IT IS LOANED UPON THE CONDITION THAT IT IS NOT TO BE REPRODUCED, COPIED OR LOANED TO OTHERS WITHOUT WRITTEN PERMISSION OF DURATEK AND IS TO BE RETURNED UPON REQUEST.		DIMENSIONS ARE IN INCHES UNLESS NOTED CAD FILE No. C067RP00030120202 REVIEWERS OF ORIGINAL (REV. 0) DRAWN BY M. ROZINSKI 05/12/04 CHECKED BY R.BREHEN 05/12/04 ENGINEER J.GHITA 05/12/04		INEEL PM-2A TANK REMOVAL SEQUENTIAL DIAGRAMS	
		SIZE B DRAWING NUMBER C-067-RP0003-012 REV. 2		SCALE 1 = 55 WT. N / A SHEET 2 OF 4	



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DEC. .XX $\pm .01$ DEC. .XXX $\pm .005$				REVIEWERS OF ORIGINAL (REV. 0)	
ANGLES $\pm 1^\circ$ FRACTIONS $\pm 1/8$				DRAWN BY M. ROZINSKI 05/12/04	
DOES NOT APPLY TO REFERENCE DIMENSIONS				CHECKED BY R.BREHEN 05/12/04	
THIS DRAWING IS THE PROPERTY OF DURATEK IT IS LOANED UPON THE CONDITION THAT IT IS NOT TO BE REPRODUCED, COPIED OR LOANED TO OTHERS WITHOUT WRITTEN PERMISSION OF DURATEK AND IS TO BE RETURNED UPON REQUEST.				ENGINEER J.GHITA 05/12/04	
				SIZE B DRAWING NUMBER C-067-RP0003-012 REV. 2	
SCALE 1 = 55				WT. N / A SHEET 3 OF 4	



<input type="checkbox"/> PROPRIETARY <input checked="" type="checkbox"/> NON-PROPRIETARY		FSCM No. 54643		 Duratek™
TOLERANCES (UNLESS NOTED) HOLE DIA. & LOC. ±1/32 DEC. .X ±.1 DEC. .XX ±.01 DEC. .XXX ±.005 ANGLES ±1° FRACTIONS ±1/8 DOES NOT APPLY TO REFERENCE DIMENSIONS		DO NOT SCALE PRINT		
THIS DRAWING IS THE PROPERTY OF DURATEK IT IS LOANED UPON THE CONDITION THAT IT IS NOT TO BE REPRODUCED, COPIED OR LOANED TO OTHERS WITHOUT WRITTEN PERMISSION OF DURATEK AND IS TO BE RETURNED UPON REQUEST.		DIMENSIONS ARE IN INCHES UNLESS NOTED CAD FILE No. C067RP00030120402 REVIEWERS OF ORIGINAL (REV. 0)		INEEL PM-2A TANK REMOVAL SEQUENTIAL DIAGRAMS
DRAWN BY M. ROZINSKI		05/12/04		SIZE B
CHECKED BY R.BREHEN		05/12/04		
ENGINEER J.GHITA		05/12/04		
		SCALE 1/2000		DRAWING NUMBER C-067-RP0003-012
		WT. N / A		REV. 2
		SHEET 4 OF 4		

Appendix H

**Agency Comment Resolution Forms
from Review of Revision 1 Draft**



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: RD/RA WP Addendum 1

DATE: 11/9/04

REVIEWER: DOE-ID

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
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GENERAL COMMENTS

SPECIFIC COMMENTS

1	N/A	N/A	A field change DAR No. 114290 was previously prepared, reviewed by the Agencies, and issued against Addendum 1. The changes from this DAR need to be incorporated into revision 1 to Addendum 1.	Comment Accepted



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: EDF-2606 REVIEW OF ANALYTICAL DATA FOR A HAZARDOUS WASTE DETERMINATION FOR THE CONTENTS OF THE PM-2A TANKS (TSF-26)

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
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GENERAL COMMENTS

SPECIFIC COMMENTS

1	Figure 2	7	This figure is a depiction of sampling sites from the PM-2A tanks. The figure shows three sampling sites. However, four composite samples were taken from each of the tanks. According to EDF-5246, two composite samples were taken at grid 13. The figure should indicate that two samples were taken from grid 13.	Comment accepted. Will add words to figure to indicate that 2 composite samples were collected at grid location 13.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Group 3 RD/RA WP Addendum 1 for TSF-26, PM-2A Tanks – Phase 1 Tank Removal and Site Remediation for Test Area North, Waste Group 1, Operable Unit 1-10, Revision 0 – Draft Change 10-13-04

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1	N/A	N/A	<p>This revised work plan is attempting to add actions via a modification of a completed work plan, Group 3 RD/RA Work Plan Addendum 1, which was created to address the excavation and removal of the PM-2A tanks. These actions should be addressed in the addendum 2 work plan which was to deal with treatment as necessary of the tank contents, and transport and disposal of the PM-2A tanks. Accordingly this current revision is very fragmented in its approach. It mentions the treatment of the V-14 tanks contents yet provides no details as to what that treatment will be. It also notes the need for filling the void space in the V-13 tank after placement yet provides no details as to how that will be accomplished (P. 1-2). EPA recommends that a decision be made on how to address the contents of the V-14 tank and then a work plan be developed that addresses this action as well as transport and placement of the PM-2A tanks. References to treatment of the tank contents should be removed from this addendum.</p>	<p>Comment Noted. Revision 0 of Addendum 1 provided for tank removal and placement in the TAN-607 High Bay pending the subsequent confirmation that the tank contents would require treatment and the determination of treatment technology to apply. Based on further review of the previous sampling data and the most recent discussions with the Agencies tank V-13 does not require treatment and the determination of treatment requirements and technology for tank V-14 is still pending. Once tank V-14 treatment requirements are determined, it will be treated, if required, either at TAN or at the ICDF SSSTF, and this treatment will be addressed in a new Addendum 2. If the sampling of tank V-14 indicates that PCE is no longer present in the tank waste, the tank will be shipped directly to ICDF and placed in the waste cell without further treatment. If PCE is not present there will be no need to prepare an Addendum 2 to the RD/RA WP to cover treatment of the waste.</p> <p>Since tank V-13 does not require treatment, the only additional step to accomplish final disposition is transport of the tank to ICDF for disposal. This involves using a transporter to lift V-13 from its supporting jack stands in the TAN-607 high bay, transporting V-13 to ICDF, and offloading/placing V13 into the ICDF landfill. Void space fill is part of ICDF operations and is performed by ICDF to meet landfill operations requirements (see response to comment 2 below). For tank V-14, it is desired to have the option to transport the tank to ICDF for subsequent treatment at the SSSTF. Preparations are required at SSSTF (secondary containment and shielding) prior to the transport of the tank.</p>

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Group 3 RD/RA WP Addendum 1 for TSF-26, PM-2A Tanks – Phase 1 Tank Removal and Site Remediation for Test Area North, Waste Group 1, Operable Unit 1-10, Revision 0 – Draft Change 10-13-04

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
				The added scope in this Addendum 1 for both tanks V-13 and V-14 is essentially transport to ICDF with placement in the landfill for V-13 and placement at SSSTF for V-14. We believe it is reasonable and efficient to revise Addendum 1 to address the transport. This will allow V-13 to be transported to ICDF and disposed immediately and will allow V-14 to be transported to ICDF and placed at the SSSTF as soon as it makes sense to do so. In adding this scope to Addendum 1, the majority of the changes involve adding a new subsection under Section 4, Remedial Design, and a new subsection under Section 6, Remedial Action Work Plan.
2	N/A	N/A	The Work Plan Addendum 1 as described on page 1-2, “addresses transporting and placing the PM-2A tanks at the ICDF [INEEL CERCLA Disposal Facility] and grouting Tank V-13 for void space fill.” However, little discussion of void space fill with grout or solid debris is discussed in this document. The document should include additional discussion of the void space fill of Tank V-13 including grouting versus use of solid debris and how these procedures will be carried out. An additional section should be added to Section 4.3, the detailed design description to address these issues.	Comment Noted: As part of the disposal process ICDF has prepared a soil bathtub in the landfill to receive the PM-2A tanks, the V-Tanks, and other tanks. Once placed in the soil bathtub ICDF will place grout around these tanks, possibly place debris in and around the tanks, and grout the void spaces within the tanks. These activities are part of ICDF landfill operations and therefore are not described in detail in this Addendum 1 change.
3	N/A		The text in the work plan still describes tank contents removal. For example, on page 2-9, the first bullet of Section 2.4, the design criteria, discusses mitigation of release of contaminants during tank content removal. Assuming the tank contents are not planned to be removed, these references should be removed from the document.	Comment Accepted: This appears to be an isolated artifact from the original Group 3 RD/RA WP. The words “tank contents removal” will be deleted.

SPECIFIC COMMENTS

1	Table of Contents	v through vii	The table of contents (TOC) does not reflect changes made to the document. For example, Section 4.3.10 is not included in the new TOC. The TOC should be updated.	Comment Accepted. The TOC will be updated when the draft is finalized. The entire document will be technically edited prior to the finalization.
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PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Group 3 RD/RA WP Addendum 1 for TSF-26, PM-2A Tanks – Phase 1 Tank Removal and Site Remediation for Test Area North, Waste Group 1, Operable Unit 1-10, Revision 0 – Draft Change 10-13-04

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
2	List of Acronyms	ix through x	The section contains a list of acronyms and does not appear to be updated to include additional text in the document. For example, SSSTF [Staging, Storage, Sizing and Treatment Facility] is not included in the acronym list. The document should be reviewed to ensure all acronyms are included in the list.	Comment Accepted. The entire document will be technically edited prior to the finalization all new acronyms will be added to the list.
3	Section 3	3-1	There is no discussion of any uncertainty associated with transport or placement of the PM-2A tanks. Is this true or was this over looked in the rewrite of this addendum.	Comment Noted. Corrosion and integrity of the tanks was discussed in the original RD/RA WP Addendum 1 uncertainties. All transportation uncertainties and risks have been evaluated during the preparation of PLN-1787 Transport Plan for the Transport of PM-2A Tanks between TAN and ICDF.
4	Section 4.3.10, 1 st Para.	4-7	This paragraph notes that treatment of V-14 will occur in the pit. Since this will not happen the text should be removed.	Comment accepted
5	Section 4.3.10, 2 nd Para.	4-7	This discusses the use of trailer hardware and tie downs that will be utilized during transport to ICDF. Is this the same hardware that was used during transport from the excavation to the high bay? If so, state that in this paragraph.	Comment noted. The trailer hardware and tie downs shown in the drawing referenced in this section were designed to be DOT compliant. While the same exact hardware may not be utilized, for transport, similar hardware that is DOT compliant will be evaluated and utilized.
6	Section 4.3.10	4-8, 2 nd Full Para.	Please provide some estimate of the time that the shipping of the tanks will occur and the time that the road will be shut down to the public.	Comment Accepted. This information was considered in preparation of the transportation plan. The following words will be added to Section 4.3.10, "Transport and highway closure time over the 5 miles of public highway is estimated to be no more than about 2 hours for each tank shipment."

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Group 3 RD/RA WP Addendum 1 for TSF-26, PM-2A Tanks – Phase 1 Tank Removal and Site Remediation for Test Area North, Waste Group 1, Operable Unit 1-10, Revision 0 – Draft Change 10-13-04

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
7	Section 4.3.10	4-9	This section provides a detailed design description for tank transport and placement at the ICDF. On page 4-9, the document describes two options for offloading the tanks from the transporter; however, the document does not indicate what criteria will be used to select an option. Additional information should be provided regarding how an option will be selected.	Comment noted. This will be included in the attached transport and placement plan. The ICDF is responsible for offloading at the landfill and is currently evaluating different methods for offloading but will probably use a crane pick to remove the tanks from the transporter and the saddles. Will add the following new paragraph after the two listed options: "Selection of the option for offloading will be based on equipment availability and cost. The unloading will be a standard crane lift unless it is more costly than other methods and/or the crane is unavailable."
8	Section 4.3.10	4-9, 2 nd Para.	This notes that drilling a hole below the centerline will render the tank from holding fluid. Given that the tank would have approximately 25,000 gallons of capacity left this does not appear to be accurate. Additional explanation should be provided. For example is the hole to be level with the waste?	Comment noted. The ICDF indicated to the project that in order to render the tanks "nontanklike" that it was necessary through their procedures that one or more holes be drilled below the centerline of the tank. During one of the agency calls it was agreed that the holes should be 4 to 5 inches in diameter and placed below the centerline of the tanks.
9	Table 4-1	4-10	This table lists major equipment; however, the equipment used to grout the tanks is not provided in this list. The equipment used to grout the tanks should be included in this list.	Comment noted. This is an ICDF operation and will be done in the same manner as any other grouting performed at the ICDF.
10	Table 4-5	4-12 and 4-13	This table provides a list of design calculations and analyses, which support the design. EDF-5246, the PM-2A Tanks ICDF Transportation and Placement Plan, is not included in this list but should be.	Comment accepted.
11	Sec. 6	6-1	This section provides an introductory paragraph to the remedial action work plan; however, this introduction does not describe transport of the tanks to the ICDF or grouting. Mention of tank transport to the ICDF and grouting of Tank V-13 should be included in this paragraph.	Comment accepted.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Group 3 RD/RA WP Addendum 1 for TSF-26, PM-2A Tanks – Phase 1 Tank Removal and Site Remediation for Test Area North, Waste Group 1, Operable Unit 1-10, Revision 0 – Draft Change 10-13-04

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
12	Fig. 6-1	6-2 and 6-3	This figure shows a working schedule for the project; however, the schedule is out-of-date and does not reflect work completed on the project or changes made on the project to date. The schedule should be updated to show completed tasks and changes in the work plan.	Comment Accepted. To reflect the added scope, the following new activities will be added to Figure 6-1 and Table 6-1. Since this document remains a “plan” the schedule will not be updated to show historical progress on existing activities. Tank V-14 Sampling Tank V-13 Transport and Disposal at ICDF Tank V-14 Transport to ICDF Tank V-14 Treatment Determination
13	Table 6-1	6-3	This section is a deliverable schedule for the project; however, the schedule is out-of-date and does not reflect work completed on the project or changes made on the project to date. The schedule should be updated to show completed tasks and changes in the work plan.	Comment accepted. See response to No. 12 above.
14	Table 6-2 Sec. 6-5	6-4/6-19 through 6-21	Table 6-2 provides a list of supporting documents, and Section 6.5 discusses the supporting documents; however, neither the table nor the section include the Transport Plan, Transport of PM-2A Tanks between TAN and ICDF. The Transport Plan should be included in Table 6-2 and Section 6.5.	The Transport Plan is listed as a supporting document in section 6.2.3 along with the IDCF Transport and Placement Plan. As noted in the response to EPA comment No. 1 on the Transport Plan, we overlooked INEEL protocol where such plans are not released outside the INEEL and therefore we will not be sending this plan to IDEQ or EPA when it is finalized. We will retain the identification of the plan as a supporting document in section 6.2.3.
15	Sec. 6.2.3.5	6-16	This section describes placement of V-14 and void space fill. It appears that a note from the previous section is include in the header to section 6.2.3.5. This error should be corrected.	Comment accepted. Correct, the note portion should not be a header but a note that goes with Section 6.2.3.5.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Group 3 RD/RA WP Addendum 1 for TSF-26, PM-2A Tanks – Phase 1 Tank Removal and Site Remediation for Test Area North, Waste Group 1, Operable Unit 1-10, Revision 0 – Draft Change 10-13-04

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
16	Sec. 6.2.3.7	6-16	This section describes placement of Tank V-14 at the ICDF SSSTF and includes the erection of radiological screening. However, secondary containment is not discussed. The erection of secondary containment in the ICDF SSSTF, if necessary, prior to treatment should be included in this section.	Comment accepted. A discussion of secondary containment at SSSTF for storage prior to treatment will be included in this revision. The current plan would be to move shield walls and secondary containment from the TAN-607A High Bay to SSSTF at the same time as V-14 is moved. Actual discussion of treatment, if necessary, and any additional secondary containment to be utilized during treatment will be discussed in the RD/RA WP Addendum 2.
17	Sec. 6-3	6-16 through 6-18	This section discusses inspections, but does not indicate if any inspections of the tanks at the landfill be conducted. A prefinal inspection of the tanks at the ICDF may be warranted and should be considered.	Comment Noted. Based on the new Section 6.2.3, Tank Transport and Placement at ICDF, either a new section will be added to the existing prefinal inspection (PFI) checklist for PM-2A Tank Removal or a new PFI checklist will be prepared. No change to the language in Section 6.3 is required.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: **TRANSPORT PLAN, TRANSPORT OF PM-2A TANKS BETWEEN TAN AND ICDF**

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1	N/A	N/A	There is an extensive use of references to PLNs and PDRs. It is recommended that a table of these documents be compiled that provides the name of the PLN/PDR and a short description of what it is, example "PLN 522, Quality Program Plan for Waste Generator Services, - quality requirement for characterization of waste".	<p>This transport plan was submitted to supplement the RD/RAWP Addendum 1 for the tank transport from TAN to ICDF. The plan was prepared by the INEEL Packaging and Transportation organization. This professional organization follows INEEL program requirement documents (PRD), plans (PLN), and procedures (MCP) to ensure all hazardous material transport is in full compliance with DOT, DOE, and INEEL requirements.</p> <p>The responses below were prepared with this in mind. Additionally, because we overlooked INEEL protocol where such plans are not released outside the INEEL, we will not be sending this plan to IDEQ or EPA when it is finalized.</p> <p>If any comments below need to be addressed with respect to the RD/RAWP Addendum, we would like to handle accordingly.</p> <p>We apologize for any confusion this may have caused.</p>
SPECIFIC COMMENTS				
1	3.3	8	This paragraph discusses the tiedown specifications and provides a reference. Please provide the specification that will be used for this transport.	Comment noted: The trailer hardware and tie downs shown in the drawing C-067-RP0003-003 of the original WP were designed to be DOT compliant. While the same exact hardware may not be utilized, for transport, similar hardware that is DOT compliant will be evaluated and utilized.
2	3.4	8	This section describes the trailer to be used to transport the tanks and indicates that, "The trailer must meet TAN-607A high bay handling and floor loading requirements." However, these requirements are not provided. This section should provide the high bay handling and floor loading requirements or a reference to these requirements.	Comment noted. The floor loading requirements are presented in the RD/RA WP as PEI-EDF-007.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: **TRANSPORT PLAN, TRANSPORT OF PM-2A TANKS BETWEEN TAN AND ICDF**

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
3	4.2	9, 2 nd Para	This paragraph discusses the need for an ALARA review if specific trigger points are identified. What are these trigger points, and where will the contamination control and temporary shielding that may be necessary based on the ALARA review be discussed?	Comment noted. The radiation level will be evaluated at the time of shipment, and shielding/controls will be added as necessary for the transport. The probable controls are distance and shield blankets. As noted in Section 7.4 of the plan, the driver will need to have rad worker training and proper radiological dosimetry. The trigger points process and ALARA review, if required, are addressed through the MCP-3562 work planning and hazard identification/mitigation process.
4	4.3	9, 1 st two paras.	It is not clear how the FMCSR limit relates to this action. Given that the drive is allowed to drive 11 hours in a 14 hour period, it is not clear how this impacts the transport of the tanks to ICDF. Is it anticipated that the process will exceed a 14 hour period or 11 hours of driving?	Comment noted. It is not anticipated that the drive time for moving each tank will exceed 11 hours of driving time. There also will probably be at least a day between the movement of each tank from TAN to the ICDF.
5	6.3.1	11	This section describes the loss of containment and indicates that the probability of an accident resulting in loss of containment is extremely low for similar INEEL shipments. The section references EDF-3135, <i>Assessment of the Accident with Fire Probability for Moving TRU Drums from RWMC to ANL-W and Back</i> . The similarities between the risk assessment provided in EDF-3135 and the specific details of this project are not immediately clear. Additional information regarding why the risk assessment in EDF-3135 is relevant to the conditions of this project should be provided or a probabilistic risk assessment should be completed for this project.	Comment noted. The assessment of risk for this shipment has been performed by the INEEL Packaging and Transportation organization. In this case the assessment is based on similar INEEL shipments.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: **TRANSPORT PLAN, TRANSPORT OF PM-2A TANKS BETWEEN TAN AND ICDF**

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
6	7.3	12	<p>This section describes highway closure and discusses that the highway will be closed in accordance with the “approved traffic control plans.” It is unclear whose approval is being referenced. This section should indicate who will approve the traffic control plans.</p> <p>In addition, this section indicates that “The time that the public access portion of the route is blocked will be kept to a minimum.” A general estimate of the time for highway closure, including the sweep and transport time, of the route should be included.</p>	Comment noted. The DOT is the approver of the traffic control plans for the approximately 5 miles of public road that will be closed during the tank movement from TAN to ICDF. The road will be closed for about two hours for the movement between TAN and the north site gate.
7	7.4	12	<p>This paragraph discusses the need for a RWP if the package exceeds 5 mrem/hr. Will these tanks exceed that value? If so, it should be noted in this section.</p>	Comment noted. The radiation level will be evaluated at the time of shipping and shielding controls will be added as necessary for the transportation. The probable controls are distance and shield blankets.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: TRANSPORT PLAN, TRANSPORT OF PM-2A TANKS BETWEEN TAN AND ICDF

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ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
8	8	14 through 16	<p>This section describes the INEEL Transportation Safety Document (TSD) requirements and 19 items that are to be addressed as part of the transport plan. TSD items 18 and 19 address the loading and unloading activities. However, the transport plans does not address these issues because loading and unloading are a facility operations and are "...outside of the scope if this transport plan." If the TSD indicates that loading and unloading are to be addressed in the transportation plan it is unclear how these items are outside of the scope of the transportation plan. The loading and unloading of the tanks should be described in the transportation plan.</p> <p>In addition, the Section references provided for TSD items 16 and 17 do not appear correct. Section 7.1 is referenced for Item 16, as low as reasonably achievable (ALARA); however, this section does not include discussion of ALARA. Section 7.3 is referenced for Item 17, transport route, including pickup and delivery locations; however, Section 7.3 only discusses the highway closure. The sections referenced for the TSD items should be reviewed and corrected as necessary.</p>	Comment noted. See response to general comment 1.
9	Appendix A	Fig. A-5	<p>This figure shows the transport route at the ICDF. However, the route shown on Figure A-5 is not the same as the route shown on Drawing 628850 or in EDF-5246. In addition, Figure A-5 shows placement of the tanks in Cell 2 of the ICDF while the other drawings and text indicate tank placement in Cell 1. Figure A-5 should be corrected as necessary.</p>	Comment noted. The actual placement of the tanks into a cell is part of ICDF Operations. Which cell they will be placed in and placement procedure will be finalized to best meet the landfills operational needs and schedule.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: EDF-5246, PM-2A TANKS ICDF TRANSPORTATION AND PLACEMENT PLAN

DATE: 10/29/04 **REVIEWER:** U.S. EPA

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1	N/A	N/A	A discuss of the accident/spill response plan should be included.	<p>Comment noted. In the event of an emergency the INEEL Emergency Response Organization (ERO) would be notified and PLN-114 "INEEL EMERGENCY PLAN RCRA CONTINGENCY PLAN" would be invoked. This plan describes the overall process developed to respond to and mitigate consequences of emergencies at the INEEL. These are standard procedures at the INEEL and are not typically included as part of an ICDF transportation and placement plan. For OU 1-10 remediation projects emergency response is addressed in Section 10, Emergency Response Plan, of the HASP.</p> <p>To highlight how emergency response is implemented, the following paragraph will be inserted under Section 5, Environment, Safety, Health, and Quality of the PM-2A Tanks RD/RAWP Addendum 1.</p> <p>"In the event of an emergency situation during transport of the PM-2A tanks between TAN and the ICDF, emergency response to ensure worker and public safety will be implemented through the INEEL Emergency Plan/RCRA Contingency Plan, PLN-114 (ref), Transportation Addendum 9, PLN-114-9 (ref), and the Transport Plan for Transport of PM-2A Tanks between TAN and ICDF, PLN-1787 (ref). Notification, in the event of an incident or accident, will be made to the INEEL Warning Communication Center (WCC). WCC will notify the INEEL Fire Alarm Center to initiate emergency response actions in accordance with PLN-114 and Transportation Addendum 9, PLN-114-9."</p>
2	N/A	N/A	The V-14 tank will not be placed in the ICDF cell prior to treatment. This document should be revised to state that.	Comment accepted. Will revise to temporarily store tank V-14 in the SSSTF area at the ICDF.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: EDF-5246, PM-2A TANKS ICDF TRANSPORTATION AND PLACEMENT PLAN

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SPECIFIC COMMENTS

1	Sec. 3.2	11, 2 nd bullet	The details on the grouting and/or filling the tank(s) with debris should be included	Comment noted. These activities are part of ICDF landfill operations and therefore are not described in detail in this placement plan.
2	Attachment 1		The type is too small to read. Please provide a legible attachment.	Included a new attachment.

PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION: Group 3 RD/RA WP Addendum 1 for TSF-26, PM-2A Tanks – Phase 1 Tank Removal and Site Remediation for Test Area North, Waste Group 1, Operable Unit 1-10, Revision 0 – Draft Change 10-13-04

DATE: 10/29/04 **REVIEWER:** ID DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
GENERAL COMMENTS				
1	N/A	N/A	Section 6 is confusing in that there appears to be a disjoint between the early and latter parts of the Section. This document is the RD/RA Work Plan for site removal and site remediation (at TAN), and the initial Sections 6 and 6.1 and Figure 6-1 and Table 6-2 reflect this. However, the tasks list and descriptions (Section 6.2 Remedial Action Work Tasks) includes tasks (section 6.2.3) that could be assigned a “Phase 2” designation (PM-2A tanks transport to and placement at the ICDF, and potential treatment described in “Notes”). It is understood that treatment of the V-14 contents will be the subject of Addendum 2, but Section 6 should still be revised, including Figure 6-1 and Table 6-1 to encompass the additional tasks described later in Section 6.2.	Comment accepted. Will revise Section 6, Figure 6-1, and Table 6-1 to reflect the added scope. The following new activities will be added to Figure 6-1 and Table 6-1 Tank V-14 Sampling Tank V-13 Transport and Disposal at ICDF Tank V-14 Transport to ICDF Tank V-14 Treatment Determination
SPECIFIC COMMENTS				
1	Sec. 4.1	4-2, last bullet	The last sentence that “Tank V-14 will be transported to an ICDF disposal cell or to a pad at the SSSTF for further PCE reduction/stabilization (if necessary).” V-14 most likely not go to an ICDF disposal cell without treatment and/or additional characterization verifying that the tank contents meet the LDR standards for disposal in an ICDF cell. Please qualify the last sentence of this bullet.	Comment accepted. Text will be revised.
2	Sec. 4.3.10	4-7, 1 st Para	We suggest deleting the statement “This assumes that stabilization treatment of tank V-14 can be performed in the waste disposal cell”. It is nearly a certainty at present that treatment of any kind of the V-14 contents of any kind in the disposal cell will not occur. Also, delete in the third sentence “If this is not the case then...”	Comment accepted. Text will be revised.

PROJECT DOCUMENT REVIEW RECORD

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DATE: 10/29/04 **REVIEWER:** ID DEQ

ITEM NUMBER	SECTION NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
3	Sec. 4.3.10	4-8, las para.	At the end of the third sentence, it is suggested that “... <i>in the cell.</i> ” Be added at the end of the sentence. This clarifies what “compacted soil” is being referred to.	Comment accepted. Text will be revised.
4	Sec. 4.3.10	4-9, first para.	It is not a certainty that both tanks, especially Tank V-14, will be offloaded and immediately, as implied here, “...placed in a pre-constructed soil cradle within cell 1 at the ICDF.” V-14 may be staged for an interim period at the SSSTF.	Comment accepted. Text will be revised.
5	Sec. 4.3.10	4-9, last para.	Please indicate how the 3-5 inch holes that will be drilled into each PM-2A tank, below the centerline, will not result in loss of grout from the tanks.	Comment noted. The holes are an ICDF requirement and ICDF operating practices for grout void space fill provide a process that compensates for the 3-5 inch holes.
6	Sec. 6, Fig. 6-1, and Table 6-1	1 st para, p. 6-1 through 6-4	Please make clear that the tasks described here are apparently only for “Phase 1” of the remedial action, as referred to in the Table 6-1 heading. The tasks listed in the Section 6 narrative on page 6-1 end with the restoration of the site at TAN. It is apparent from this task list and the accompanying figure and table that the remedial action described does not include the actual remediation and disposal of the PM-2A tanks and contents. The latter are not described until later in Section 6.	Comment noted. Will add the transport of the two PM-2A tanks from TAN to ICDF to the list. Will add the disposition of V-13 to a ICDF disposal cell and will show V-14 treatment as Phase 2.
7	Sec. 6.2.3	6-14 to 6-15	This section is essentially the start of “Phase 2” of the remedial efforts directed at the PM-2A tanks. The tasks from this section forward are not covered or described in the Gantt chart (Figure 6-1) or the schedule (Table 6-1) at the beginning of Section 6. Both should encompass this addition (i.e. “Phase 2”) to the remedial action work tasks. Add a “note” between the third and fourth bullets stating that treatment of the tank contents may occur, as that is the purpose of transport to the SSSTF.	Comment accepted. Will revise/update gantt chart and schedule. This section is the revision to Phase 1 to transport the tanks. Treatment of V-14, if necessary, will be covered in an Addendum 2 to the WP and should be considered Phase 2. Comment Accepted.